sinochem

In science we trust

SINOCHEM COMPLIANCE RESPONSIBILITY AGREEMENT

Sinochem Compliance Obligation Convention

Gl mpbcp rm c lqspc rfc am k n_ lw mncp_rcq gl dsjj am k njg_ lac ugrf j_u* dsj jjq grq jce_j pcqnm lqg`gjgrgcq rm rfc qmagcrw* ajgc lrq* qf_pc fmjbcpq* c k njmwccq _ lb mrfcp qr_ icfmjbcpq* _ lb c lqspc rfc dsjj g k njc k c lr_rgm l md emtcp lg le _ lb mncp_rg le c lrcpnpgqc _aampbg le rm j_u* rfc *Qg lma fc k Am k njg_ lac M`jge_rgm l Am l tc lrgm l* gq fcpc`w dmp k sj_rcb dmp _jj qr_ rm _`gbc `w8

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

/, Qrpgarjw am k njw ugrf _nnjga_`jc j_uq _ lb pcesj_rgm lq _ lb rfc am k n_ lw psjcq _ lb nmjgagcq,

0, Am k njg_ lac qf_jj qr_pr dpm k rfc rmn u fgjc _jj qr_ qf_jj r_ ic rfc g lgrg_rgtc rm am k njw,

1, Gk n_prg_jjw _ lb d_grfdsjjw npm k mrc am k n_ lw'q bctcjmn k c lr* q_dces_pb rfc am k+ n_ lw'q g lrcpcqrq _ lb pcnsr_rgm l* _ lb `c bctmrcb rm m lc'q mu l bsrw dmp rfc g lrcpcqr md rfc am k n_ lw,

2, K_g lr_g l pcnsr_rgm l* dsj jj npm k gqcq _ lb qsgr rfc _argm l rm rfc umpb,

3, C lamsp_ec pcnmprg le md l m l+am k njg_ lac `w _jj qr_ ,

II. Comply with Management Obligations Prescribed by Law

/, Am k njw ugrf _nnjga_`jc j_uq _ lb pcesj_rgm lq* _aacnr rfc _b k g lgqrp_rgm l _ lb qs+ ncptgqgm l g k njc k c lrcb `w rfc emtcp l k c lr _ lb grq pcjct_lr _ec lagcq g l _aampb_ lac ugrf rfc j_u* s lbcpr_ic qsncptgqgm l `w rfc ns`jga* r_ ic rfc pcqnm lqg`gjgrgcq dmp qmagcrw _ lb g l+ tcqrmpq,

0, Am k njw ugrf _ lb g k njc k c lr rfc _prgajcq md _qqmag_rgm l _nnpmtcb `w rfc c lrgrw rf_r ncpdmp k q rfc g l tcqrmp'q bsrgcq &qf_pc fmjbcp'* cqr_`jgqf _ lb qrpgarjw g k njc k c lr ucjj+bc+ lcb _ lb `_j_lacb g lrcp l_j qsncptgqgm l _ lb k_l_ec k c lr nmjgagcq* _ lb npmrcar rfc g lrcp+ cqrq md g l tcqrmpq* apcbgrmpq* _ lb mrfcp qr_ ic fmjbcpq,

1, Qrpgarjw am k njw ugrf rfc _qqcr _nnp_gq_j _ lb jg le npmacbspc* npgmp cv_ k g l_rgm l _ lb _nnpmt_j `cdmpc rp_ lq_argm lq* am k ncrgrgtc ns`jga rp_bg le* _ lb m`jge_rgm lq md g l dmp k _rgm l

bgqajmqspc* _lb lmrg a_rgmlq dmp kcpecp* _aosgqgrgml* cosgrw mp _qqcr rp_lq_argmlq* mrfcp rf_lrfmqc _nnpmtcb `wamlrpmjjgleqf_pcfmjbcpq,

2, Lmdslbq* emmbq* qcptgacq mp mrfcp _qqcrq qf_jj `c npmtgbcb rm pcj_rcb n_prgcq ugrf+msr amlqgbcp_rgml* _lb lm rp_lq_argmlq ugrf pcj_rcb n_prgcq qf_jj `c amlbsarcb _r sld_gp npgacq,

Ugrfmsr rfc amlqclr md rfc clrgrw &qf_pcfmjbcp' rf_r ncpdmpkq rfc bsrgcq md rfc gltcq+rmp* lmlc md rfc dmjjmugle _arq qf_jj `c _jjmucb8

+Clrcpgle glrm _epcckclrq ugrf pcj_rcb n_prgcq dmp rfc rp_lqdcp md npmncprw mp jm_lq mp npmtgbgle es_p_lrcc dmp pcj_rcb n_prgcq,

+Cqr_`jgqfgle hmglr tclrspc ugrf pcj_rcb n_prgcq* mp gltcqrgle gl clrcpnpgqcq mu lcb mp c ca+rgtcjw amlrpmjjcb `w rfc bgpcarmpq* qsncptgqmpq* qclgmp k_l_ecpq mp rfcgp ajmqc pcj_rgtcq,

`Pcj_rcb n_prgcq* pcdcp rm rfc amk n_lwq bgpcarmpq* qsncptgqmpq* qclgmp k_l_eckclr* _lb rfcgp ajmqc pcj_rgtcq* _q ucjj _q rfc clrcpnpgqcq mu lcb mp cddcargtcjw amlrpmjjcb `w rfcqc ncpqmlq,

3, Grgq dmp`gbbcl rm clrcpglrm amlrp_arq ml `cf_jd md rfc amk n_lw mp cle_ecgl mrfcp amlbsar rf_r k_w f_tc camlmkga _lb jce_j amlqcosclacq ml rfc amk n_lw ugrfmsr _s+rfmpgx_rgml mp cvaccb rfc t_jgb jce_j _srfmpgx_rgml,

4, Bgjgeclrjw ncpdmpk bsrgcq _lb _qqskcrfc jg_`gjgrw dmp rfc `pc_af md qsaf bsrgcq,

5, ?lwd_`pga_rgml* d_jqgdga_rgml* r_k ncpgle* qgelgle mp gqqsgle md amlrp_ar* qcaspgrw* bmaskclr_rgml* lmrc* pcacgnr* _aamslrgle pcnmprq* mp qr_rgqrgaq rf_r _pc lmr amlqgqrclr ugrf rfcd_arq gq qrpgarjw npmfg`grcb,

6, K_hmp bcagqgml+k_igleqf_jj lmr tgmj_rc _nnjga_`jc pcesj_rgmlq _lb amk n_lw psjcq _lb nmjgagcq,

III. Comply with Statutory Obligation of Tax Payment

/, Amk njw ugrf t_pgmsqj_uq _lb pcesj_rgmlq _nnjga_`jc gl Afgl__lb mrfcp amslrpgcq &pcegmlq' ufcpc rfc `sqglcqq gq amlbsarcb* ncpdmpk r_v_rgml m`jge_rgmlq* _lb _argtcjw ncp+dmpk rfc m`jge_rgml md ugrffmjbgle _lb n_wgler_vcq,

0, Pcr_gl rpsc _lb amk njcrc r_v+pcj_rcb k_rcpg_jq _q pcosgpcb `w r_v_rgml _srfmpgrgcq* _lb bgqajmqc r_v gldmpk_rgml _q pcosgpcb, R_v pcegqrp_rgml _lb r_v bcaj_p_rgml qf_jj `c amlbsarcb _aampbgle rmj_u9 _lw amlac_jkclr* mk gqqgml* mp k gqqr_rckclr gq qrpgarjw npm+ fg`grcb,

1, Clqspc `sqglcqq mncp_rgmlq amk njw ugrf _nnjga_`jc r_v j_uq _lb pcesj_rgmlq, R_v ct_qgml*r_v bmbegle mp dp_sbsjclr r_v npcdcpclacq _pc qrpgarjw npmfg`grcb,

IV. Comply with Legal Employment Obligations

/, Pcqncar _lb npmrcar rfc jce_j pgefrq _lb glrcpcqrq md ck njmwccq* _lb lmr agpas k+ tclrrfc dsj jjkclr md jce_jm`jge_rgmlq rm ck njmwccq,

0, ?lw bgqapgkgl_rgml _lb f_p_qqkclr qf_jj `c npmfg`grcb* glajsbgle `sr lmr jgkgrcb rm bgqapgkgl_rgml mp f_p_qqkclr ml rfc epmslb md l_rgml_jgrw* p_ac* crflgagrw* pcjgegml* eclbcp* _ec* k_pgr_jqr_rsq* _lb nfwqga_jamlbgrgml* cra,

V. Comply with Anti-corruption Obligations

/, Qcr cv_k njc _lb pcqgqr amppsnr `cf_tgmp* _lb rfc dmjjmugle _arq _pc npmfg`grcb8

+?`sqc md nmucp* _lb gldpglec snml rfc pgefrq _lb glrcpcqrq md rfc amk n_lw _lb qf_pcfmjbcpq,

+R_igle _bt_lr_ec md _srfmpgrw dmp ncpqml_je_gl _lb a_sqc b_k_ec rm rfc glrcpcqrq md rfc amk n_lw* rfc clrgrgcq mp qs`qgbg_pgcq,

+Bgtcpqgml*ck `cxxjckclr* mp k gq_nnpmnpg_rgml md amk n_lw npmncprw,

+M cpgle mp _aacnrgle `pg`cq,

+R_igle _bt_lr_ec md rfc nmqgrgml rm af_llcj rfc glrcpcqrq md rfc amk n_lw rm mlcqcjd mp rm qncag a pcj_rcb ncpqmlq rfpmsef `sqglcqq rp_lq_argmlq* mp rm d_agjgr_rc amlbgrgmlq dmp rfc_`mtc+kclrgmlcb ncpqmlq rm cle_ec gl npm r+k_igle _argtgrgcq,

0, Lm mlc k_w cle_ec gl _lw `sqglcqq _argtgrw mp qr_pr _`sqglcqq* mp f_tc fgq-fcp qnmsqc* afgjbpcl _lb-mp rfcgp qnmsqcq cle_ec gl `sqglcqq _argtgrw mp qr_pr _`sqglcqq rf_r gq pcj_rcb rm rfc ncpdmpk_lac md fgq-fcp bsrgcq,

1, Umpi f_pb _lb np_argac rfpgdr9 gr gq dmp`gbbcl rm amlbsar bsrw amnqsknrgml mp cv+

rp_t_e_lr qnc lbgle rf_r gq gl tgmj_rgm l md pcjct_lr pcesj_rgm lq,

2, Dsjjw am k njw ugrf rfc SL Am l tc lrgm l _e_g lqr Amppsnrgm l _lb mrfcp g lrcp l_rgm l_j am l tc lrgm lq rm u fgaf Afg l_ f_q _aacbcb* _`gbc `w rfc _lrg+amppsnrgm l j_uq* pcesj_rgm lq _lb pcesj_rmpw nmjgagcq _nnjga_`jc g l rfc ams lrpgcq &pcegm lq' u fcpc rfc `sqg lcqq mncp_rcq _lb rm pcjct_lr `sqg lcqq _argtgrgcq* _lb npmfg`gr n_w k c lr g l _lw dmp k md npmncprw mp npm+ tgbgle qcptgacq* cra, rm ns`jga m ag_jq mp qg k gj_p ncpqm l l cj dmp am k k cpag_j _bt_lr_ec mp mrfcp g k npmncp g lrcpcqrq* _lb c lqspc rfc _aasp_rc* npmncp* _lb am k njcrc pc cargm l md _jj mtcpqc_q cvnc lbgrspcq g l rfc am k n_lw'q `mmiq _lb _aams lrgle pcampbq,

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

/, ?ju_wq npgmpgrgxc q_dc npmbsargm l* qrpgarjw am k njw m`jge_rgm lq g l _aampb_lac ugrf rfc pcjct_lr j_u _nnjga_`jc rm q_dcrw g l npmbsargm l* c lqspc rfc q_dcrw md rfc npmbsargm l npmacqq _lb npmbsarq* npctc lr* pcqrp_g l* _lb pcnmpr _lw nmrc lrg_j mp _ars_j f_x_pb pcj_rcb rm rfc q_dcrw _lb fc_jrf md rfc c k njmwccq* rfc ns`jga* ajgc lrq cra,* pcqsjrgle dpm k s lq_dc am lbgrgm l md rfc npmbsargm l npmacqq _lb rfc npmbsar* _lb cam lm k ga mp pcnsr_rgm l b_k+ _ec a_sqcb `w q_dcrw g lagbc lr,

0, Cqr_`jgqf* g k npmtc _lb g k njc k c lr j_`mp q_dcrw _lb fc_jrf qwqrc k* npctc lr q_dcrw _aagbc lrq _lb pcbsac maasn_rgm l_j f_x_pbq,

1,Am k njw ugrf _nnjga_`jc c l tgpm l k c lr npmrcargm l &c lcpew am lqcpt_rgm l _lb camjme+ ga_j c l tgpm l k c lr npmrcargm l' j_uq _lb pcesj_rgm lq g l Afg l_ _lb mrfcp ams lrpgcq-pcegm lq u fcpc rfc `sqg lcqq mncp_rcq* ncpdmp k m`jge_rgm lq s lbcp c l tgpm l k c lr npmrcargm l j_uq _lb pcesj_rgm lq* npctc lr* pcqrp_g l* _lb pcnmpr nmrc lrg_j mp _ars_j pgqi _lb g lagbc lr md c l tg+ pm l k c lr_j nmjjsrgm l _lb f_x_pb,

2, @sqg lcqq n_pr lcpq u fm npmtgbc qcptgacq rm rfc am k n_lw m l+qgrc qf_jj `c qs`hcar rm rfc q_k c qr_lb_pbq md q_dcrw k_l_ec k c lr _q _nnjgcb rm rfc Am k n_lw,

VII. Comply with Anti-monopoly Obligations

/, @c f_tgmpq rf_r g k ncbc rp_bc* pcqrpgar mp cvajsbc d_gp am k ncrgrgm l qf_jj lmr `c

amlbsarcb,

0, Rfc npglagnjc md d_gp amk ncrgrgml* _lrg+ kmlmnmjw j_u _lb rfc _lrgrpsqr j_uq md t_pg+ msq amslrpgcq qf_jj `c m`qcptcb,

1, Kmlmnmjw _epcc kclrq ugrf rfc c car md k_lgnsj_rgle k_picr npgacq qf_jj `c _tmgbcb,

2, Amk njw ugrf _nnjga_`jc _lrg+ kmlmnmjw j_uq md rfc pcjct_lr hspgqbgargmlq9 k_ic pcosgpcb kcpecp amlrpmj jgle pcj_rcb rm kcpecp $ _aosgqgrgml mp cosgrw mp _qqcr rp_lq_a+ rgmlq,

VIII. Comply with Obligations Against Unfair Competition

/, ?tmgb qccigle rp_bgle mnnmprslgrw mp bgqpsnr d_gp amk ncrgrgml ugrf mrfcp mncp_rmpq rfpmsef rfc _bmnrgml md kc_lq rf_r tgmj_rc ec lcp_jjw _aacnrcb `sqglcqq crfgaq,

0, Amlqagmsqjw k_glr_gl rfc d_gplcqq md rfc k_picr mpbcp*_tmgb apmubgle msr amk ncr+ grmpq dmp rfc nspnmqc md qcjjgle emmbq mp npmtgbgle qcptgacq _r npgacq `cjmu amqr,

1, ?tmgb qcjjgle emmbq mp qcptgacq _e_glqr rfc ugqfcq md rfc nspaf_qcp mp _rr_af mrfcp slpc_qml_`jc amlbgrgmlq,

2, Ncmnjc qf_jj lmr `c pcqrpgarcb dpmk nspaf_qgle bcqge l_rcb emmbq mp qcptgacq,

3, Qrpgarjw m`qcptc _nnjga_`jc glrcpl_rgml_j _lb bmk cqrga j_uq ml _lrg+sld_gp amk nc+ rgrgml,

Rfc dmjjmugle _argtgrgcq _pc qrpgarjw npmfg`grcb8

+Amslrcpdcgrgle9

+D_jqc _btcprgqgle9

+Amjjsqgtc `gbbgle9

+Amk kcpag_j `pg`cpw9

+Gldpglec kclr snml rp_bc qcapcrq9

+B_k _ec rm `sqglcqq pcnsr_rgml,

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

/, Grgq dmp`gbbcl rm cle_ec mp n_prgagn_rc gl dp_sbsjclr l_lag_j _argtgrw9 mp rm amlbsar

_lw dmp k md bcacnrgm l rm ecr _ jm_l mp dmp dmpcgel cvaf_lec rp_lq_argm lq9 mp rm am lbsar _lw gjjce_j qncasj_rgtc `swgle mp qcjjgle md apcbgr d_agjgrw mp dmpcgel asppc law9 mp rm ct_bc l_lag_j pcesj_rgm lq `w g k npmncp k c_lq9 mp rm c le_ec mp n_prgagn_rc g l rfc l_lag_j `sqg+ lcqq g l tgmj_rgm l md k_picr _aacqq am lbgrgm lq9 mp rm npmtgbc es_p_lrccq dmp _lw g lbgtgbs_j mp dmp _lw c lrgrw msrqgbc rfc am k n_lw mp _lw g lbgtgbs_j,

0, Gr gq dmp`gbbc l rm _qqgqr rfc jce_jgx_rgm l md gjjgagr npmaccbq md _qsqncarcb apg k c, Rfc dmjjm ugle `cf_tgmpq _pc npm fg`grcb8

+Jc_qc mp npmtgbc a_ngr_j _aamslr rm mrfcpq9

+?qqgqr rfc rfgpb n_prw rm am l tcpr npmncprw g lrm a_qf* l_lag_j glqrps k c lrq mp k_picr+ _`jc qcaspgrgcq,9

+?qqgqr rfc rfgpb n_prw rm rp_lqdcp ds l bq9

+?qqgqr rfc rfgpb n_prw rm am l tcpr ds l bq g lrm r_leg`jc _qqcrq rm bgqesgqc rfc qmspac _lb l_rspc md qsaf ds l bq,

1, Am l bsar `sqg lcqq ugrf ajgc lrq* g lrcp k cbg_pgcq* _lb `sqg lcqq n_prlcpq ugrf jcegrg+ k_rc _lb pcnsr_`jc ds l bq qmspacq,

X. Comply with Export Control and Economic Sanction Obligations

/, S l bcpqr_lb _lb dsjjw am k njw ugrf rfc m`jge_rgm lq s l bcp rfc pcesj_rgm lq dmp cvnmpr am l rpmj _lb cam l m k ga q_largm lq g k njc k c lrcb `w Afg l_* mrfcp ams l rpgcq* _lb g lrcp l_+ rgm l_j mpe_lgx_rgm lq qsaf _q rfc SL* u fgaf _pc _nnjga_`jc rm pcjct_lr `sqg lcqq _argtgrgcq9 `sqg lcqq _argtgrgcq qf_jj lmr `c am l bsarcb g l tgmj_rgm l md pcesj_rgm lq `w agpas k tc lrgtc* dp_sbsjc lr mp mrfcp k c_lq,

0, Am k njw ugrf rfc j_uq _lb pcesj_rgm lq m l g k nmpr _lb cvnmpr _b k g lgqrp_rgm l* am k+ njw ugrf rfc pcosgpc k c lrq md asqrm k q qsncp tgqgm l* _lb _tmgb q k seejgle* bgqesgqcb q k se+ ejgle _lb _lw mrfcp dmp k q md tgmj_rgm lq rm agpas k tc lr asqrm k q qsncp tgqgm l,

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

/, Ncpdmp k rfc m`jge_rgm lq s l bcp _aamslrgle j_uq* c lqspc rf_r rfc _aamslrgle k_+

rcpg_jq* `mmiq* _lb dgl_lag_j pcnmprq _pc rpsc* _aasp_rc* _lb amknjcrc, Qs` kgr npmknr* rpsc* amknjcrc* _lb _aasp_rc l_lag_j _aamslrgle gldmpk_rgml rm rfc gltcqrmpq* r_v_rgml _srfmpgrgcq* pcjct_lr emtcplkclr _eclagcq* _lb pcjct_lr qr_icfmjbcpq md rfc amkn_lwgl _aampb_lac ugrf j_uq _lb pcesj_rgmlq _lb _nnjga_`jc _prgajcq md _qqmag_rgml,

0, Amknjw ugrf qa_j pcesj_rgmlq9" fgbbcl pcqcptcq" mp m +`mmi _aamslr _pc qrpgarjw npmfg`grcb,

1, Amknjw ugrf pcjct_lr npmtgqgmlq md rfc qcaspgrw j_uq _lb qcaspgrw cvaf_lec j_uq md Afgl__lb mrfcp pcjct_lr amslrpgcq9 dsj jj rfc gldmpk_rgml bgqajmqspc m`jge_rgml gl _rgkc+ jw* rpsrfdsj* _aasp_rc _lb amknjcrc k_llcp,

XII. Comply with Data Protection and Information Security Obligations

/, @c pcqnmlqg`jc dmp b_r_ qcaspgrw _lb gldmpk_rgml qcaspgrw bspgle rfc _nnjga_rgml md b_r_,

0, Bspgle rfc amjjcargml _lb k_l_eckclr md gldmpk_rgml _lb b_r_8

+Qf_jj lmr qrc_j amkn_lwgldmpk_rgml _lb ncpqml_j b_r_9 mp pcjc_qc npmfg`grcb gldmp+ k_rgml9

+Qf_jj lmr qcr sn mp sqc k_jgagmsq npmep_kq glrclrgml_jjw* mp pcjc_qc _lb rp_lqkgr gl+ dmpk_rgml rf_rgq npmfg`grcb `wj_uq mp _lb pcesj_rgmlq,

+Qf_jj lmr qrc_j* pcqcjj* bgqajmqc* r_kncp ugrf* mp b_k_ec amkn_lwgldmpk_rgml _lb ncpqml_j b_r_gl rfc amkn_lwq nmqqcqqgml,

+Qf_jj lmr bmuljm_b mp rp_lqdcp`gknmpr_lr ncpqml_jgldmpk_rgml mp ampnmp_rc b_r_rm ncpqml_j km`gjc b_r_rp_lqkgqqgml bctgacq ugrfmsr_srfmpgx_rgml,

+Qf_jj lmr a_ppw mp rp_lqkgr msr md rfc amslrpwgldmpk_rgml rf_r k_w_ car l_rgml_j qcaspgrw* f_pk ns`jgaglrcpcqrq*gknar rfc qcaspgrw md amkn_lwgldmpk_rgml*_lb ncpqml_j gldmpk_rgml ugrfmsr rfc amlqclr md grq mulcp mp rf_r k_wgldpglec snml glbgtgbs_jglrcp+ cqrq,

XIII. Comply with Confidentiality Obligations

/,Dsj jj m`jge_rgmlq rm iccn amkn_lwq rp_bc qcapcrq _lb npmrcar rfc aml bclrg_jgl+

dmpk_rgml md rfc amknn_lw _lb rfc clrgrw* rfc pcjct_lr aml bclrg_j gldmpk_rgml md ajgclrq qf_jj `c icnr aml bclrg_j gl _aampb_lac ugrf j_uq* pcesj_rgmlq _lb amlrp_ar npmtgqgmlq,

0, Qrpgarjw amknjw ugrf pcjct_lr _bkglgqrp_rgml pcesj_rgmlq pce_pbgle rfc npmtgqgml md aml bclrg_j gldmpk_rgml rm rfgpbn_prgcq,

XIV. Comply with Obligation to Avoid Insider Trading

Qrpgarjw amknjw ugrf rfc npmtgqgmlq md apgkgl_j j_u* qcaspgrgcq j_u* pcjct_lr j_uq _lb pcesj_rgmlq md rfc amslrpw _lb pcegml gl ufgaf rfc amknn_lw gq jma_rcb* _q ucjj _q rfc npmtgqgmlq md rfc pcjct_lr psjcq _lb pcesj_rgmlq md rfc amknn_lw _lb rfc clrgrw* _lb rfc dmjjmugle _arq _pc npmfg`grcb8

+Amknn_lgcq* glbgtgbs_jq mp qncag a pcj_rcb ncpqmlq sqc glqgbcp gldmpk_rgml rm rp_bc _qqcrq mp l_lag_j qcaspgrgcq,

+Bgqajmqc glqgbcp gldmpk_rgml rm lml+`sqglcqq+pcj_rcb ncpqmlq* rm ncpqmlq ufm f_tc lmrqgelcb _ lml+bgqajmqspc _epcc kclrmp rm qncag a pcj_rcb ncpqmlq,

jmuglelmpkq8

+?tmgbgldpgleckclrmdrfcglrcjjcars_jnpmncprwpgefrqmdrfcrfgpbn_prw9

+M`r_gl pcjct_lr jgaclqc _lb pc_af _epcckclr ugrf rfc pgefr fmjbcp dmp sqgle rfgpb+n_prwglrcjjcars_jnpmncprwpgefrq&glajsbgleamknsrcpqmdru_pc',

+Amlbsarglosgpgcq ml pcjct_lrglrcjjcars_jnpmncprwpgefrqgl _rgkcjw k_llcp ufcl pcqc_pafgle_lb bctcjmngle lcu npmbsarq_lb rcaflmjmegcq,

+A_ppwmsr pcqc_paf _lb _l_jwqgq mdrfcglrcjjcars_jnpmncprwpgefrqgl rfcr_pecramsl+ rpgcq&pcegmlq'dmpmtcpqc_qglrcjjcars_jnpmncprwammncp_rgml,

1, Cqr_`jgqf _lb amknjw ugrf _nnjga_`jc _bkglgqrp_rgml kc_qspcq rm npctclr _lb k_l_ecrfcnmrclrg_jmp_ars_jgldpgleckclrmdglrcjjcars_jnpmncprwpgefrq,

XVI. Ensure Compliance by Business Partners

/, Dsjjwslbcpqr_lb `sqglcqqn_prlcpq _lb cqr_`jgqf amppcqnmlbgleamknjg_lacqr_l+ b_pbqdmpbc_jgleq ugrf `sqglcqqn_prlcpq,

0, Rfcamknjg_lacnfgjmqmnfw_lbamknjg_lacpcosgpckclrqmdrfcamkn_lwqf_jj`c amkkslga_rcb_lbgknjckclrcbrm`sqglcqqn_prlcpq*_lb`sqglcqqn_prlcpqqf_jj`cpc+ osgpcbrmpcqncar_lbslbcpqr_lbrfcamkn_lw%qamknjg_lac k_l_eckclrpcosgpckclrq dmp`sqglcqqn_prlcpq*_lbrmamknjw ugrf rfcpcjct_lrnpmtgqgmlqmdrfgqAmltclrgml gl+ tmjtgle`sqglcqqn_prlcpq,

Jcr sq umpi rmecrfcp rm snfmjb rfc *Qglmafck Amknjg_lac M`jge_rgml Amltclrgml**

Rfc *Qglmafck Amknjg_lac Pcqnmlqg`gjgrw ?epcckclr* gq cvcasrcb rmclf_lac amknjg+ _lac k_l_eckclr* clqspcc cargtc ncpdmpk_lac md amknjg_lac+pcj_rcb bsrgcq* qcr dmprf amknjg_lac `mslb_pgcq* _lb pkjw cqr_`jgqf `mrrmk+jglc amknjg_lac kglbqcr, G fcpc`w slbcpr_icml `cf_jd md _lb kwqcjd rm qrpgarjw amknjw ugrf rfc *Qglmafck Amknjg_lac K_l_eckclr Pcesj_rgml* _lb ncpdmpk _jj amknjg_lac+pcj_rcb bsrgcq _q qncag cb gl rfc *Qglmafck Amknjg_lac M`jge_+ rgml Amltclrgml*,

I. Company's Compliance Management Objectives

Rfc amkn_lw _gkq rm qr_lb_pbgxc `sqglcqq mncp_rgml k_l_eckclr* gknpmtc amp+ nmp_rc emtcpl_lac a_n_`gjgrw _q ncp j_u* npctclr k_hmp jce_j amknjg_lac pgqiq* clqspc jce_jjw amknjg_lr `sqglcqq mncp_rgml* k_glr_gl Qglmafck'q ampnmp_rc glrcpcqrq _lb pcn+ sr_rgml*_lb fcjn gl rfc `sgjbgle md _umpjb+aj_qq ejm`_jjw amkncrgrgtc clrcpnpgqc rfpmsef rfc cqr_`jgqf kclr_lb ncpdcargml md rfc Amkn_lwq amknjg_lac k_l_eckclr qwqrck,

II. Company's Compliance Management Philosophy

Amknjg_lac qf_jj qr_pr dpmk rfc rmn ufgjc _jj qr_ qf_jj r_ic rfc glgrg_rgtc rm amknjw* qr_w _`mtc rfc `mrrmk jglc md amknjg_lac pgqiq* k_ic np_arga_j amknjg_lac c mprq _lb apc_rc t_jsc rfpmsef amknjg_lac,

III. Compliance Responsible Party

?jj Qglmafck clrgrgcq _lb cknjmwccq _pc amknjg_lac pcqnmlqg`jc n_prgcq, Ml qgelgle rfgq ?epcckclr* c_af pcqnmlqg`jc n_prw qf_jj _qqskc rfc pcqnmlqg`gjgrw md amknjg_lac k_l_eckclr* _lb amlbsar amknpcfclqgtc amknjg_lac k_l_eckclr md rfc ncpqmllcj slbcp k_l_eckclr _lb rfc k_rrcpq rfcw _pc pcqnmlqg`jc dmp-npmacqqcb* _lb _qqskc rfc

Rfc amknn_lw _bmnrq _`xcpm rmjcp_lac nmjgaw dmp _lw tgmj_rgml* _lb clamsp_ecq ctcpw ck njmwcc rm pcnmpr* amknj_gl* _lb _btgqc ml _lw lml+amknjg_lac, Ctcpw qglejc tgm+ j_rgml ugjj `c bc_jr ugrf qcpgmsqjw,

IV. Compliance Obligations and Duties

Amknjw ugrf j_uq* pcqncar psjcq* dmqrcp _ amknjg_lac+`_qcb kglbqcr* _ailmujcbec amknjg_lac apgrcpg_* _lb np_argac rfc amknjg_lac nfgjmqmnfw, Dmjjmu rfc *Qglmafck Amk+ njg_lac K_l_eckclr Pcesj_rgml* _q _esgbcjglc md _argml* m`qcptc rfc *Qglmafck Amk+ njg_lac M`jge_rgml Amltclrgml** _`gbc `w rfc amknn_lwq _prgajcq md _qqmag_rgml* psjcq _lb pcesj_rgmlq* _lb amknjw ugrf _jj _nnjga_`jc j_uq* glrcpl_rgml_jambcq _lb amltclrgmlq* _lb _jj glbsqrpg_j lmpkq _nnjga_`jc rm rfc hm`, Umpi d_grfdsjjw _lb bgjgeclrjw* npmrcar rfc glrcpcqrq md rfc amknn_lw* k_glr_gl amknn_lw pcnsr_rgml* q_dces_pb amknn_lw qcapcrq* _lb pcqmjsrcjw pcqgqr _lw gjjce_j mp lml+amknjg_lr _argmlq* ufgaf k_wa_sqc rfc amknn_lw rm `c qsqncarcb md tgmj_rgml md j_uq mp ufgaf _pc cvnpcqqjw npmfg`grcb,

Dmjjmu rfc amknn_lwq amknjg_lac k_l_eckclr pcosgpckclrq `_qcb ml rfc *Qglm+ afck Amknjg_lac K_l_eckclr Pcesj_rgml* _lb rfc *Qglmafck Amknjg_lac M`jge_rgml Amltclrgml** c_plcqrjw ncpdmpk t_pgmsq amknjg_lac m`jge_rgmlq rfcpcslbcp* glrcep_rc amknjg_lac pcosgpckclrq glrm ampnmp_rc emtcpl_lac* npmbsargml _lb mncp_rgml k_l_ec+ kclr* _lb `sqglcqq bctcjmnkclr* _lb clqspc lml+maasppclac md _lw tgmj_rgml, Pcnmpr tgmj_rgmlq _lb nmqqg`jc gkn_arq rm rfc amkncrclr qsncptgqmpq gl _rgkcjw k_llcpgl _a+ ampb_lac ugrf amknn_lw psjcq _lb pcesj_rgmlq,

V. Performance of Compliance Obligations and Duties

Rfc amknjg_lac pcqnmlqg`jc n_prwqf_jj ncpdmpk t_pgmsq amknjg_lac m`jge_rgmlq _lb dsj jj pcjct_lr amknjg_lac k_l_eckclr bsrgcq,

Jc_pl _lb k_qrcp rfc *Qglmafck Amknjg_lac K_l_eckclr Pcesj_rgml* _lb Qglmafck Amknjg_lac M`jge_rgml Amltclrgml** ncpdmpk rfc bsrgcq qrgnsj_rcb gl rfc Qglmafck Amk+ njg_lac Pcqnmlqg`gjgrw Slbcpr_igle* _lb _ailmujcbec rfc amknn_lwq amknjg_lac nfgjmq+ mnfw _lb asjrspc,

?argtcjwn_prgagn_rcgl `sgjbgle rfc amknjg_lac qwqrck rfpmsefmsr rfc clrcpnpgqc_lb q_dces_pb rfc c cargtc mncp_rgml md rfc amkn_lwq amknjg_lac qwqrck,

?ju_wq k_glr_gl _u_pclcqq md amknjg_lac pcosgpckclrq _lb r_ic pcqnmlqg`gjgrw dmp rfc amknjg_lac md mlc'q mul `cf_tgmp* ncpqmllcj slbcp k_l_eckclr*_lb k_rrcpq npm+ acqqcb,

?aacnr _lb ammncp_rc ugrf rfc amknjg_lac _sbgr _lb pctgcu*_lb _aacnr ns`jga qs+ ncptgqgml ml amknjg_lac,

VI. Handling of Violations

G fcpc`w slbcpr_ic _lb u_pp_lr rf_rG ugjj amldmpk rm rfc amkn_lwq amknjg_lac pc+ osgpckclrq* `c _aamslr_`jc rm rfc bgpcar qsncptgqmp dmp rfc amknjg_lac m`jge_rgmlq _lb ncpdmpk_lac md amknjg_lac bsrgcq _lb _aacnr rfc qsncptgqgml `w rfc bgpcar qsncptgqmp `_qcb ml rfc m`jge_rgmlq qnca a_jjw qcr dmprf fcpcgl,Gl a_qc md _lw tgmj_rgml*G_k ugjjgle rm `c_p pcjct_lr jg_`gjgrgcq glasppcb gl _aampb_lac ugrf j_uq _lb _nnjga_`jc psjcq _lb nmj+ gagcq md Qglmafck*_aacnr bcbsargml md rfc ncpdmpk_lac ct_js_rgml md kw amknlw _lb kwqcjd*_lb `c_p _jj pcjct_lr amlqcosclacq _pgqgle rfcpcdpmk,

Rfgq *Qglmafck Amknjg_lac Pcqnmlqg`gjgrw ?epcckclr* qf_jj `c cvcasrcb gl rum amn+ gcq _lb qf_jj r_ic c car snmlqgelgle `w rfc n_prgcq fcpcrm _lb qf_jj pck_gl c cargtc rgjj rfc b_rc md cvngpw md m ac mp rcpkgl_rgml md rfc ckmjmwkclr amlrp_ar md rfc amknjg_lac pcqnmlqg`jc n_prw,

Bgpcar Ssncptgqmp8

B_rc8

Pcqnmlqg`jc N_prw8

B_rc8

sinochem

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