

SINOCHEM COMPLIANCE RESPONSIBILITY AGREEMENT

Sinochem Compliance Obligation Convention

adWdfafa W egdWfZWUa_ bS` k abWsfWb [Xg^Ua_ b^S` UWi [fZ `Si f Xg^ ^e [fe ^WS^ dWba` eT [f[Wb fa fZWeaU[Wk U^W fe eZSdWZa ^VWb W_ b^akWb S` V afZWdefS] VZa ^VWb S` V W egdWfZW Xg^ [b^W_ W fSf[a` aXYahWd [Y S` V abWsf [Y W fWbd[eWSUadV [Y fa ^Si f fZWE [aUZW_ 5a_ b^S` UWA T ^YSf[a` 5a` hW f[a` [eZWWT 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 dWg^Sf[a` e S` V fZWUa_ bS` k dg^Wb S` V ba ^U[Wbž

\$z5a_ b^S` UWeZS^efSd^Xa_ fZWfab i Z[^WS^efS eZS^efS] WfZW [[fSf[hWfa Ua_ b`kž %ž;_ bSd[S^k S` V XS[fZ Xg^ k bca_ afWUa_ bS` k e VWhWab_ W fl eSXWgSdV fZWUa_ ž bS` k e [fWbfe S` V dWbSf[a` f S` V TWVWhafW fa a` We ai ` Vgfk Xad fZW [fWbfe aXfZW Ua_ bS` kž

&ž? S [fS [dWbSf[a` f Xg^ ^bca_ [eWb S` V eg [f fZWSUf[a` fa fZW adž

' ž7' UagSYWdWbdf [Y aX` a` žUa_ b^S` UWTK S^efS ž

II. Comply with Management Obligations Prescribed by Law

#z5a_ b`k i [fZ Sbb ^UST ^W^Si e S` V dWg^Sf[a` e SUWb f fZWSV_ [[efSf[a` S` V egž bWb[e[a` [b^W_ W fW Tk fZWYahWd _ W f S` V [fe dWWhS` f SYW U[Wb [SUUadS` UWi [fZ fZW^Si f g` VWfS] WegbWb[e[a` Tk fZWbgT [Uf fS] WfZWdWbba` eT [f[Wb XadeaU[Wk S` V [ž hWefadež

\$z5a_ b`k i [fZ S` V [b^W_ W f fZWSd[UWb aXSeeU[Sf[a` SbbcahW Tk fZWW f[fk fZSf bWb[e[a` e fZW [hWefade Vgf[Wb /eZSdWZa ^VWb WefST [eZ S` V efd[Uf`k [b^W_ W f i W^ZVWž `W S` V TS`S` UW [fWd S^egbWb[e[a` S` V _ S` SYW_ W f ba ^U[Wb S` V bca fWUf fZW [fWb Wbfe aX [hWefadeUdW [fadel S` V afZWdefS] VZa ^VWbž

%Efd[Uf`k Ua_ b`k i [fZ fZWSeeW Sbbca[eS^S` V _ [Y bcaUWgdW bca dW S_ [Sf[a` S` V SbbcahS^TWadWfd` eSUF[a` eUa_ bW [f hWbgT [Uf dS [Y 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 ad SeeW fdS` eSUF[a` el afZWd
fZS` fZaeWSbbdahW Tk Ua` fca` Y eZSdWZa` VWdž

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

I [fZagf fZWUa` eW fa XfZWW f[fk /eZSdWZa` VWd fZSf bWd ad_ e fZWWgf[Ve a XfZW[hVdž
fad` a` Wa XfZWa` ai [Y Sufe eZS^TWS` ai W,

Ž7` fWd[Y [fa SYdWU_ W fe i [fZ dWSfW bSdf[Ve XadfZWfdS` eXWdaXbdabWfk ad` aS` e ad
bdah[V[Y YgSdS` fWVd dWSfW bSdf[Vež

Ž7efST [eZ[Y` a[f hW fgdM [fZ dWSfW bSdf[Ve ad[hVef[Y [W fWbd[Ve ai ` W adW WUž
f[hWk Ua` fca` VW Tk fZW[dWUfa del egbWd h[e ad[eW [ad_ S` SYWd adfZWd U` a eWdWSf[hVdž

DWSfW bSdf[Ve dWVd fa fZWUa_ bS` k e V[dWUfa del egbWd h[e ad[eW [ad_ S` SYW_ W fi
S` V fZWd U` a eWdWSf[hVd Se i W` Se fZWW fWbd[Ve ai ` W ad WUf[hWk Ua` fca` VW Tk
fZWeWbWda` ež

' ž:f [e XadT[VWV fa W fWd[fa Ua` fdSufe a` TWZS` Xa XfZWUa_ bS` k adW YSYW[afZWd
Ua` VgUf fZSf _ Sk ZShWUa` a_ [US` 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[↑YW f`k bWd ad_ Vgf[Ve S` V Seeg_ WfZW[↑ST [↑fk XadfZWT dWSUZ aXegUZ Vgf[Vež

)ž3` k XSTd[USf[a` f XS` e[XUSf[a` f fs_ bWd[Yl e[Y [Y ad [eeg[Y a XUa` fdSUF eWUgd[fk
VaUg_ W fsf[a` f` afW dWUW[bfi SUUag` f[Y dWb adfel ad efSf[ef[Ue fZSf 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[Vež

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[Ve
/dWY[a` efii ZWVfZWT ge[Wee [e Ua` VgUfW f bWd ad_ fsj Sf[a` aT [YSf[a` el S` V SUf[hWk bWž
Xad_ fZWaT [YSf[a` aXi [fZ Za` V[Y S` V bSk[Y fsj Wež

\$žDWFŠ[` fdjWS` V Ua_ b`WfSj ždWSfW _ SfWdS`e Se dWg[dW Tk fSj Sf[a` SgfZad[fWet
S` V V[eU^aeWfSj [` Xad_ Sf[a` Se dWg[dWžFSj dW[efcSf[a` S` V fSj VWU`SdSf[a` eZS^TW
Ua` VgUfW SUUadV[` Y fa` Si` -S` k Ua` UWS^_ W fl a_ [ee[a` f ad_ [eefSfW_ W f [e efdUf`k bca Ž
Z[T [fWž

%ž7` egdWTge[` Wee abWfSf[a` e Ua_ b`k i [fZ Sbb`UUST`WfSj `Si` e S` V dWg`Sf[a` ežFSj
WfSe[a` f fSj` VaVY[` Y adXSgVg`W f fSj` b`WfW UWe SdWefdUf`k bca Z[T [fWž

IV. Comply with Legal Employment Obligations

#žDWebWUf S` V bca fWUf fZW`WfS^dYZfe S` V [` fWdWefe aXW_ b`akWWeł S` V ` af U[dUg_ Ž
hW f fZWg^` ^_ W f aX`WfS^aT` fYSf[a` e fa W_ b`akWWež

\$ž3` k V[eUd_ [` Sf[a` S` V ZSdSee_ W f eZS^TWbca Z[T [fWf [` U`gV[` Y Tgf` af [` [fW
fa V[eUd_ [` Sf[a` adZSdSee_ W f a` fZWYdag` V aX` Sf[a` S` fkl` dSUW`WZ` [U[fkl` dW[Y[a` f
YW VWd` SYW_ Sd[fS^efSfgeł S` V bZke[US^Ua` V[f[a` f` WfUž

V. Comply with Anti-corruption Obligations

#žEwf WjS_ b`WS` V dW[ef Ua` dgbf TWZSh[ad S` V fZW`a` ai [` Y SUfe SdWbca Z[T [fW,
Ž3TgeWaxbai` Wd S` V [` Xd[` YWgba` fZWdYZfe S` V [` fWdWefe aXfZWUa_ bS` k S` V
eZSdZa` VWež

ŽFS[` Y SVhS` fSYWaXSgfZad[fk` XadbWea` S^YS[` S` V USgeWWS_ SYWfa fZW[` fWdWefe aX
fZWUa_ bS` kł fZWfW f[fW` e degTe[V[SdWēž

Žb[hWb[a` f W_ TWI` W_ W fl ad_ [eSbb`cb`d[Sf[a` aXUa_ bS` k bca bWf`kž

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 5adgbf[a` S` V afZVd[fVd Sf[a` S^ Ua` hW f[a` e fa i Z[UZ 5Z[S ZSe SUUWWhI ST[VWTk fZWS` f[ZUadgbf[a` `Si el dWg`Sf[a` e S` V dWg`Sfack ba`U[Ve Sbb`UUST`W[fZWLag` fdVd/dW[a` efii ZWdWfZWTge[Wee abWdSfVe S` V fa dWWhS` fTge[Wee SUf[hf[Vd S` V bdaZ[T[f bSk_ W f [S` k Xad_ aXbdabWfK adbdaz h[V[Y eWdh[UWd WUž fa bgT`Ua U[S`e ade[[SdbWda` `W`adUa__ WU[S^SVhS` fSYWad afZVd[bdaWd[fVdVefel S` V W egdWfZWSUUGdSfW bdaWd S` V Ua_ b`WdW WUf[a` aXS^ ahWdVSe Wj bW V[fgdVd[fZWLd_ bS` keTaa] eS` V SUUag` f[Y dWUadVež

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

#ž 3↑ Ske bd[a d[f[I WeSXWbdaVgUf[a` † efd[Uf`k Ua_ b`k aT`Ysf[a` e [SUUadV` UWi [fZ fZWdWWhS` f `Si Sbb`UUST`Wfa eSXWfK [bdaVgUf[a` † W egdWfZ WeSXWfK aXfZWbdaVgUf[a` bdaUWee S` V bdaVgUfel bdWWh fl dWfcdS[† S` V dWbadf S` k bafW f[S^adSufgS^ZSI SdV dWSfWV fa fZWeSXWfK S` V ZWb`fZ aXfZWW_ b`akWdVd fZWbgT`Uf U`W fe WUž dWeg`f[Y Xa_ g` eSXW Ua` V[f[a` aXfZWbdaVgUf[a` bdaUWee S` V fZWbdaVgUf[S` V WUa` a_ [U addWbgfSf[a` VS_ Ž SYWUSgeW Tk eSXWfK [U[VW fž

\$ž 7efST`feZ[[bdaHWS` V [b`W_ W f`STadeSXWfK S` V ZWb`fZ ekefW_ † bdWWh f eSXWfK SUU[VW fe S` V dWgUWaUUGbSf[a` S^ZSI SdVež

%ž 5a_ b`k i [fZ Sbb`UUST`WWh[da` _ W f bdaWUf[a` /W Wd`k Ua` eWdhSf[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` fdVd/dW[a` e i ZWdWfZWTge[Wee abWdSfVd bW`ad_ aT`Ysf[a` e g` VVd W h[da` _ W f bdaWUf[a` `Si e S` V dWg`Sf[a` el bdWWh fl dWfcdS[† S` V dWbadf bafW f[S^adSufgS^d[e] S` V [U[VW faXW h[Ž da` _ W fs`ba`gfa` S` V ZSI SdVž

&ž 4ge[Wee bSdf` Wde i Za bda h[VWeWdh[UWd fa fZWLd_ bS` k a` Že[fWeZS^TWegTWUf fa fZWeS_ WefS` VSdVe aXeSXWfK _ S` SYW_ W f Se Sbb`UW fa fZW5a_ bS` kž

VII. Comply with Anti-monopoly Obligations

#ž 4WZ Sh[a de fZSf [bWWhdSVW dWfcd[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 aXhSqZ
age Uag` fd[We eZS^TWaTeWhWz

%z? a` aba`k SYdWV_ W fei [fZ fZWW WUfaX_ S` [bg`Sf[Y_ Sd] Wf bd[UWe 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 _ WdWdUa` fda^ ^ Y dVsfW fa _ WdWd` SUCg[e[f[a` adWcg[fk adSeeWf fdS` eSUZ
f[a` ež

VIII. Comply with Obligations Against Unfair Competition

#z3ha[V eWV[^ Y fdSV[Y abba`fg` [fk adV[edgbf XS[dUa_ bW[f[a` i [fZ afZWabWsfad
fZdagYZ fZWSVabf[a` aX_ Vb` e fZSf h[a` SfWYW Wb`k SUWb fW 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 XadfZWbgbaeWaXeW^` Y YaaVe adbdah[V[` Y eWh[UWe Sf bd[UWe TWai Uaefž

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

&zBwab`WeZS^^ afTWdWefUFW Xa_ bgdJZSe[Y VVe[Y` SFW YaaVe adeWh[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

FZWXa` ai [^ Y SUf[h[f[We SdWefUf`k bdaZ[T fWV,

Z5ag` fWdWf[` Y-

Z8S`eWSVhWd[e[` Y-

Z5a`ge[hWT[VV[` Y-

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

Z` Xd[` YW_ W f gba` fdSVWeWdWfe-

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 YSYWadbSd[U]bSfW[` XSGVg`W f` S` U[S^Suf[h[fk-adfa Ua` VgUf

S` k Xad_ aXVWUWbfa` fa YWf S` aS` ad Xad XadWY` WYUZS` YWfdS` eSuf[a` e-adfa Ua` VgUf
S` k [^WfS^ebWUg`Sf[hWTgk[Y adeW^f Y aXUdW[f XSU[ffk ad XadWY` UgddW Uk- adfa WhSVW
` S` U[S^dWYg`Sf[a` eTk [bcbWd_ Wb` 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 bcbh[VWYgSdS` 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 fZW`WfS`f] Sf[a` aX[^Uf bcbUWWe aXS egebWUfW Ud_ WfZW
Xa`ai [Y TVZSh[ade SdWbcbZ [T [fW,

Z>WSeWadbcbh[VWUfb[FS^SUJag` f fa afZWb-

Z3ee[ef fZWfZ [dV bSdfk fa Ua` hWf bcbWf [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[eWfZWeagdUWS` V
` SfgdWaXegUZ Xg` Vež

%ž5a` VgUf Tge[Wee i [fZ U`W fel [fWd_ W[Sd]Wef S` V Tge[Wee bSdf` Wde i [fZ `Wf[fZ
_ SfWS` V dWbgfST`WXg` Ve eagdUWz

X. Comply with Export Control and Economic Sanction Obligations

#žG` VWefS` V S` V Xg`k Ua_ b`k i [fZ fZWaT`fYSf[a` e g` VWdfZWdWYg`Sf[a` e XadWYbadf
Ua` fcb`S` V WUa` a_ [UeS` Uf[a` e [b`W_ W fW Tk 5Z[` S] afZWdUag` fdWef S` V [fWd SZ
f[a` S`adYS` [Sf[a` e egUZ Se fZWG@i Z [UZ SdWSbb`[UST`Wfa dWWhS` f Tge[Wee Suf[h[f]Wb-
Tge[Wee Suf[h[f]Wb eZS`` af TWUa` VgUfW [h[a`Sf[a` aXdWYg`Sf[a` e Tk U[dJg_ hW f[hW
XSgVg`W f adafZWd_ Wb` ež

\$ž5a_ b`k i [fZ fZW`Si e S` V dWYg`Sf[a` e a` [bcbf S` V WYbadf SV_ [[efoSf[a` t Ua_ Ž
b`k i [fZ fZWdWg[dW_ W fe aXUgefa_ e egbWch[e]a` t S` V Sha[V e_ gYY`f` Yf V[eYg[eW e_ gYŽ
Y`f` Y S` V S` k afZWdXad_ 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`fYSf[a` e g` VWdSUJag` f[Y`Si et W egdWfZSf fZWSUJag` f[Y_ SŽ

fWd[S^el Taa] e[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[` hWefadef S] Sf[a`
SgfZad[f[Wel dWVH S` f YahWd _ W f SYW U[Wel S` V dWVH S` f eFS] WZa` VWbe aXfZWUa_ bS` k [`
SUUadS` UMI [fZ `Si e S` V dWg`Sf[a` e S` V Sbb`[UST`WSdf[UWbe aXSeeaU[Sf[a` ž

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

%ž5a_ b`k i [fZ dWVH S` f bcah[e[a` e aXfZWeWUgd[fk `Si e S` V eWUgd[fk Wj UZS` YW`Si e aX
5Z[` S S` V afZVdWVH S` f Uag` fd[Wbe-Xg^ ^^fZW[` Xad_ Sf[a` V[eU`aegdWaT`[YSf[a` [` S f[_ Wž
k[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 eFV S^Ua_ bS` k [` Xad_ Sf[a` S` V bWbea` S^VSfS- addWVbeWbcaZ[T[fW [` Xadž
_ Sf[a` -

ŽZS^^ af eW` gb adgeW_ S[U]age bcaYdS_e [` fW f[a` S`k[addWVbeWS` V fčS` e_ [f [ž
Xad_ Sf[a` fZSf[e bcaZ[T[fW Tk `Si e adS` V dWg`Sf[a` ež

ŽZS^^ af eFV S^ dWVW` V[eU`aew fS_ bWdi [fZ[adVS_ SYWUa_ bS` k [` Xad_ Sf[a` S` V
bWbea` S^VSfS [` fZWUa_ bS` kebaeeWbe[a` ž

ŽZS^^ af Vai ` `aSV adfčS` eWU[badfS` f bWbea` S^[` Xad_ Sf[a` adUadbadfWVSfS fa
bWbea` S^_ aT[`WVSfS fčS` e_ [ee[a` VWh[UWbe i [fZagf SgfZad[Sf[a` ž

ŽZS^^ af USčk adfčS` e_ [f agf aXfZWUag` fdk [` Xad_ Sf[a` fZSf_ Sk S WUf` Sf[a` S^
eWUgd[fk[ZSd_ bgT`[U[` fWVefel [bSuf fZWeWUgd[fk aXUa_ bS` k [` Xad_ Sf[a` f S` V bWbea` S^
[` Xad_ Sf[a` i [fZagf fZWUa` eW` faX[fe ai ` WladfZSf_ Sk [Xd` YWgba` [` V[hVgS^[` fWž
Wefež

XIII. Comply with Confidentiality Obligations

#ž8g^ `aT`[YSf[a` e fa]WVb Ua_ bS` ke fčSVWeWUdWfe S` V bcafwUf fZWUa` VW f[S^[ž

Ād Sf[a` aXfZWUa_ bS` k S` V fZWW f[fkł fZWdWWS` f Ua` VW f[S^ Ād Sf[a` aXU[W fe eZS^TW] Wb f Ua` VW f[S^ SUUa d/S` UWi [fZ `Si eł dWg`Sf[a` e S` V Ua` fdSUF bđah[e]a` ež \$žEfd[UF`k Ua_ b`k i [fZ dWWS` f SV_ [[efđSf[a` dWg`Sf[a` e dWSdV[Y fZWbđah[e]a` aX Ua` VW f[S^ Ād Sf[a` fa fZ[dV bSdf]Vėž

XIV. Comply with Obligation to Avoid Insider Trading

Efd[UF`k Ua_ b`k i [fZ fZWbđah[e]a` e aXUd[[S^Si ł eWUgd[f]Vė `Si ł dWWS` f `Si e S` V dWg`Sf[a` e aXfZWUag` fđk S` V dW[a` [i Z[UZ fZWUa_ bS` k [e `aUSFWł Se i W^Se fZW bđah[e]a` e aXfZWdWWS` f đg Vė S` V dWg`Sf[a` e aXfZWUa_ bS` k S` V fZWW f[fkł S` V fZW Ā`ai [Y SUfe SdMbđa Z[T fVW,

Ž5a_ bS` [Vė [V[h[VgS`e ađebWU] U dWSfW bWđea` e geW[e[VWđ[Ād Sf[a` fa fdSVW SeeWfe ad ` S` U[S^eWUgd[f]Vėž

Ž6[eU`aeW[e[VWđ[Ād Sf[a` fa `a` ŽTge[VėeŽdWSfW bWđea` eł fa bWđea` e i Za ZShW `afe[Y` VW S` a` Ž[eU`aegdWSYdWV_ W f adfa ebWU] U dWSfW bWđea` ež

ai [Y` ad_ e,

Ž3ha [V [Xl[YW_ W faXFZW[fWUfgS^bdabWfk dYZfe aXFZWfZ [dv bSdfk-

ŽA TFS[dWHS` f [UW eWS` V dMSUZ SYdW_ W f i [fZ fZWd [YZf Za` VWd Xad ge[Y
fZ [dv ŽbSdfk [fWUfgS^bdabWfk dYZfe/ [U`gV[Y Ua_ bgfWlea Xi SdWfz

Ž5a` VgUf [cg [dWe a` dWHS` f [fWUfgS^bdabWfk dYZfe [S f_ Wk_ S` ` Wdi ZW
dWVSDJZ [Y S` V VWhWab [Y` W` bdaVgUfe S` V fWUZ` a` aY [Wž

Ž5Sdk agf dWVSDJZ S` V S` S`ke [e aXFZW[fWUfgS^bdabWfk dYZfe [fZWfSdWf Uag` Ž
fdW/dW [a` efiXadahWVSe [fWUfgS^bdabWfk UaabVsf [a` ž

%ž 7efST [eZ S` V Ua_ b`k i [fZ Sbb [UST`WSV_ [[efdSf [a` _ VSegdWe fa bdWfW f S` V
_ S` SYWfZWbafW f [S^adSufgS^ [Xl[YW_ W faX [fWUfgS^bdabWfk dYZfež

XVI. Ensure Compliance by Business Partners

#ž 8g`k g` VVefS` V Tge[Wee bSdf` Wde S` V VefST [eZ UadWeba` V [Y Ua_ b [S` UWefS` Ž
VSdVe XadVWS [Ye i [fZ Tge[Wee bSdf` Wdež

\$ž FZWUa_ b [S` UWbZ [aeabZk S` V Ua_ b [S` UWdWcg [dW_ W fe aXFZWUa_ b S` k eZS`^TW
Ua_ _ g` [USfW S` V [b`W_ W fW fa Tge[Wee bSdf` Wde S` V Tge[Wee bSdf` Wde eZS`^TWdW
cg [dW fa dWbWUf S` V g` VVefS` V fZWUa_ b S` kie Ua_ b [S` UW_ S` SYW_ W f dWcg [dW_ W fe
XadTge[Wee bSdf` Wde S` V fa Ua_ b`k i [fZ fZWdWHS` f bdah [e [a` e aXFZ [e 5a` hW f [a` [Ž
ha`h [Y Tge[Wee bSdf` Wdež

>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` e[T[f[3YdWV_ W f[e VjWUgFW fa W ZS` UMa_ b[Z`
S` UW_ S` SYW_ W fl W egdWV WUf[hWbWad_ S` UWaXUa_ b[S` UMDWsfW Vgf[Ve eWf XadZ
Ua_ b[S` UWTag` VSd[Ve S` V_ d_ k` VeST[eZ Taffa_ Z[WUa_ b[S` UW_ [` VeWfz; ZWdT k
g` VV[S] Wa` TWZS` XaX S` V
_ keWXfa efd[Uf` k Ua_ b` k i [fZ fZWE[aUZW_ 5a_ b[S` UW? S` SYW_ W f DWg` Sf[a` S` V
bWad_ S^Ua_ b[S` UMDWsfW Vgf[Ve Se ebWU[W [fZWE[aUZW_ 5a_ b[S` UWAT[YSZ
f[a` 5a` hW f[a` z`

I. Company's Compliance Management Objectives

FZWUa_ bS` k S[_ e fa efS` VSd[|l WTge[` We abWsf[a` _ S` SYW_ W fl [_ bcahWUaZ`
ba dSfWYahW S` UWUSbST[f[k Se bWd` Si` f bWfW f _ S` ad` WWS^Ua_ b[S` UWd[e] e[W egdW
WWS`k Ua_ b[S` f Tge[` We abWsf[a` f _ S[` fS[` E[aUZW_ e Ua dca dSfW[fWd[Ve S` V dWZ
gfSf[a` f S` V ZWb [fZWTg[V[Y aXS i` adVZU` See Y` aTS`k Ua_ bW[f[hWW fWd[VeWfZdagYZ
fZWVeST[eZ` W fS` V bWUf[a` aXfZW5a_ bS` ke Ua_ b[S` UW_ S` SYW_ W f ekefW_ z`

II. Company's Compliance Management Philosophy

5a_ b[S` UWeZS`^efSd` Xa_ fZWfab i` Z[WWS`^efS` eZS`^fS] WfZW[` [f[Sf[hWfa Ua_ b` k[
efSk STahWfZWTaffa_ f` WaXUa_ b[S` UWd[e] e[_ 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[Ve S` V W_ b`akWVe SdWUa_ b[S` UWdWeba` e[T` WbSd[VeZA` e[Y` [Y
fZ[e 3YdWV_ W fl W SUZ dWeba` e[T` WbSd[Ve eZS`^Seeg_ WfZWdWeba` e[T[f[k aXUa_ b[S` UW
_ S` SYW_ W fl S` V Ua` VgUf Ua_ b[dVZW e[hWUa_ b[S` UW_ S` SYW_ W f aXfZWbWeba` ` W
g` VVd_ S` SYW_ W f S` V fZW_ SffWVe fZVk SdWdWeba` e[T` Wxad bca UWeWf[S` V Seeg_ WfZW
dWeba` e[T[f[k 3 [

fZWUa_ bS` k SVabfe S I Wba fa`WdS` UW ba`UK XadS` k h[a`Sf[a` t S` V W UagdSYWb
WhWk W_ b`akVWfa dWbadf Ua_ b`S[t S` V SVh[eWa` S` k` a` ŽUa_ b`[S` UWž7hWk e[` Y`Wh[aŽ
`Sf[a` i [^TWVWdS`fi [fZ eWd[age`kž

IV. Compliance Obligations and Duties

5a_ b`k i [fZ `Si` e[dWbWUf dg`Wb[XefWdS Ua_ b`[S` UWŽTSeW _ [` VeWf[SU]` ai` ^WYW
Ua_ b`[S` UWUd[fWd[Si S` V b[Suf[UWfZWUa_ b`[S` UWbZ[`aebZkž8a`ai` fZWE[` aUZW_ 5a_ ž
b`[S` UW? S` SYW_ W f DWg`Sf[a` Se S Yg[VW[` WaXSuf[a` t aTeWWhWfZWE[` aUZW_ 5a_ ž
b`[S` UWA T`YSf[a` 5a` hW f[a` t ST[VWTk fZWUa_ bS` k e Sdf[UWb aXSeeU[Sf[a` t dg`Wb S` V
dWg`Sf[a` e[S` V Ua_ b`k i [fZ S`Sbb`[UST`W`Si e[[` fWd` Sf[a` S`UaVWb S` V Ua` hW f[a` e[
S` V S`[` Vgefd[S`^ ad_ e Sbb`[UST`W`fa fZWaTžI ad] X[fZ Xg`k S` V V[`YW f`ki bdfWUf fZW
[` fWd`fe aXfZWUa_ bS` ki _ S[` fS[` Ua_ bS` k dWbGfSf[a` t eSXWgSdV Ua_ bS` k eWUdWf e[S` V
dWb a`gfwk dW[e]e[S` k [^WWS`ad` a` ŽUa_ b`[S` f Suf[a` e[i Z[UZ _ Sk USgeWfZWUa_ bS` k fa
TWegebWUfW aXh[a`Sf[a` aX`Si` eadi` Z[UZ SdWY bDve`k bcaZ[T`fWž

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` UWdWg[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_ SffWbda Ž UWeWž

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

VI. Handling of Violations

; ZWdWk g` VW[S] WS` V i SdS` f fZSf; i [^Ua` Xad_ fa fZWUa_ bS` k eUa_ b[S` UWdWž cg[dW_ W feT W SUUag` fST Wfa fZWW[dWUf egbW[e]ead Xad fZWUa_ b[S` UWaT fYSf[a` e S` V bWad_ S` UWaXUa_ b[S` UWWgf[W e S` V SUWb f fZWegbW[e]ea` Tk fZWW[dWUf egbW[e]ead TSeW a` fZWaT fYSf[a` e ebWU[US^k eWf Xad fZ ZWdWž; USeWaXS` k h[a Sf[a` f; S_ i [^ Y fa TWdWWhS` f fST[f[W e [Ug dW [SUUad/S` UWi [fZ `Si e S` V Sbb fUST Wdg We S` V ba Ž [UWe aXE[aUZW_ f SUWb f VWgUf[a` aXfZWbWad_ S` UWWHS`gSf[a` aX_ k Ua_ bS` k S` V _ keWXS` V TWsdS`dWWhS` f Ua` eWc gW UWe Sd[e[Y fZWdWka_ ž

FZ[e E[aUZW_ 5a_ b[S` UWdWba` e[T[f[k 3YdWV_ W feZS^TWWY WUg 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[e]ead

6 SfW

DWba` e[T WBSdfk,

6 SfW



sinochem.

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