

**Cheongfuli (Xiamen) Co., Ltd.**  
**Anti-Corruption and Anti-Bribery Policy**

**1 Purpose**

Cheongfuli (Xiamen) Co., Ltd. (hereinafter referred to as “Cheongfuli” or “the Company”) strictly complies with laws and regulations relating to anti-corruption in all business activities, conducts business in a transparent, fair, and honest manner, and firmly resists all forms of corruption and bribery. This policy is intended to provide clear standards of conduct and compliance guidance for all employees and business partners of the Company.

**2 Scope**

This policy applies to Cheongfuli and all entities over which it has operational control. Each entity may formulate its own anti-corruption and anti-bribery policy based on its actual circumstances and industry characteristics, which shall be consistent with this policy.

**3 Definition of Corruption and Bribery**

Corruption refers to the abuse of power, position, status, or resources to obtain personal benefits for oneself or designated related parties, thereby causing harm to the Company’s interests. Bribery refers to the act of giving or promising to give property interests or other benefits to another person for the purpose of securing personal gain, resulting in harm to the Company’s interests.

**4 Prohibited Conduct**

Employees are prohibited from engaging, whether directly or through others at their direction, in the following conduct:

- 4.1 Directly or indirectly providing or promising to provide any money or other valuable items to public officials or their representatives in order to obtain improper benefits.
- 4.2 Directly or indirectly providing or promising to provide any money or other valuable items to private entities or their personnel in order to obtain, retain, or reward business benefits.
- 4.3 Giving or accepting any money or other valuable items that may influence impartial decision-making in the course of business negotiations, tendering and bidding, contract signing and performance, or other processes.

- 4.4 Employees, whether directly or through agents, consultants, family members, or other parties, accepting any money or other valuable items from a third party in return for the Company providing business benefits to such third party or any other person.
- 4.5 Misappropriating, stealing, fraudulently obtaining, or otherwise illegally occupying Company property by taking advantage of one's position or authority.
- 4.6 Providing facilitation payments to induce or expedite the routine duties or administrative actions of government authorities or officials.
- 4.7 Engaging in any other acts of corruption or bribery, or any conduct that violates this policy.

## **5 Cash Gifts, Gifts, and Entertainment**

The Company requires that all acceptance of cash gifts and gifts and all business entertainment in the course of business activities be conducted on the premise of lawful compliance, openness and transparency, and appropriateness in value, so as to eliminate any potential corruption or bribery. Prior to providing any gifts, cash gifts, or entertainment related to the Company's business to a third party, employees shall undergo the corresponding approval procedures. Where an employee receives cash gifts or gifts from a third party that fall outside a reasonable scope or may cause unfair influence on business, the employee shall decline or return them. If it is impossible to decline, the employee shall promptly surrender them to the Company for registration and filing upon receipt.

## **6 Sponsorship, Donations, and Community Investments**

The Company conducts sponsorship, charitable donations, or community investments in accordance with the principles of lawful compliance and ethical conduct, and shall avoid any undue influence on the Company's commercial decisions. The Company shall undergo approval and decision-making procedures in accordance with internal rules when making sponsorship, charitable donations, or community investments, and shall properly maintain records of all such donations, sponsorship, and community investments.

## **7 Training and Awareness**

The Company continuously strengthens anti-corruption and anti-bribery education, awareness, and training, and communicates to all employees the relevant laws and regulations, Company policies and rules, and typical cautionary cases relating to anti-corruption and anti-bribery. The Company also actively communicates the requirements of this policy to upstream and downstream supply chain partners, and promotes the establishment of a clean business ecosystem.

## **8 Reporting and Whistleblowing**

The Company encourages employees, business partners, and other stakeholders to proactively report or file complaints, whether by name or anonymously, regarding potential or actual acts of corruption to the Company. The Company strictly protects the identity information of whistleblowers, and shall not disclose the whistleblower's circumstances to the person being reported or other irrelevant persons without the whistleblower's consent. No employee shall suffer termination, demotion, reassignment, pay reduction, or other adverse treatment for refusing to participate in, cooperating with investigations into, or reporting in good faith any corrupt or bribery-related activities. Retaliation in any form shall be subject to severe and heightened accountability.

## **9 Accountability**

Where any employee violates this policy, the Company shall impose corresponding disciplinary measures based on the circumstances, including but not limited to demotion, termination of employment, and claims for damages. Where any supplier, customer, agent, consultant, or other third party having business dealings with the Company violates this policy, the Company reserves the right to pursue legal liability in accordance with legal provisions or contractual agreements, and to take corresponding measures such as terminating the business relationship and claiming compensation.

## **10 Effective Date**

This policy shall come into effect from the date of its publication.

**Cheongfuli (Xiamen) Co., Ltd.**

**XX XX, 2026**