

Anti-Corruption Policy

Policy Statement:

Yingkou Zhongjie Shida Separator Co., Ltd. (hereinafter referred to as "the Company") is firmly committed to maintaining the highest ethical standards and business integrity. We fully recognize that corrupt practices pose a serious threat to our company's reputation, business stability, and legal compliance. Therefore, we have formulated this Anti-Corruption Policy to clearly define unacceptable corrupt behaviors and ensure that all employees, management, directors, agents, contractors, and third-party partners (hereinafter referred to as "relevant personnel") fully understand and strictly comply with our ethical and legal requirements.

Scope of the Policy:

This policy applies to all relevant personnel within the Company globally, regardless of their position or location, and all must adhere to the provisions of this policy.

Zero Tolerance Principle:

The Company adopts a zero-tolerance policy towards any form of corruption. Any violation of this policy will be considered a serious breach of company discipline and will be subject to severe disciplinary measures, up to and including termination of employment or termination of partnership.

Prohibited Acts:

1. **Bribery and Kickbacks:** Strictly prohibited from offering, promising, authorizing the offering of, or soliciting, accepting, or authorizing the solicitation of any form of bribe or kickback, including but not limited to cash, gifts, services, or other financial benefits.
2. **Fraudulent Activities:** Forbidden from engaging in any fraudulent activities, such as falsifying documents, misreporting expenses, tampering with data, or making any misrepresentations that could lead to false financial statements.
3. **Abuse of Power:** Prohibited from using one's position to obtain improper benefits for oneself or others, including but not limited to interest transfers and quid pro quo deals.

Gifts and Entertainment Policy:

To ensure fair professional judgment and maintain company reputation, the Company has established strict guidelines for gifts and entertainment:

- **Transparency:** All received gifts and entertainment must be disclosed transparently to direct supervisors or the compliance department.
- **Moderation:** The value of gifts and entertainment should be kept reasonable and appropriate, avoiding any situations that may create conflicts of interest or influence professional judgment.
- **Legality:** The acceptance and offering of gifts and entertainment must strictly comply with applicable laws and regulations.

Conflict of Interest Management:

Relevant personnel must proactively identify and avoid any conflicts of interest that may affect their professional judgment or the interests of the company. Upon discovering a potential conflict of interest, they must immediately disclose it to their direct supervisor or the compliance department and take appropriate measures to resolve it.

Reporting Mechanism:

The Company has established a secure and confidential reporting channel to encourage employees and partners to actively report any suspected corrupt practices. The Company guarantees the confidentiality of reporters and prohibits any form of retaliation.

Training and Education:

The Company will provide regular anti-corruption training and education to all relevant personnel to enhance their awareness of anti-corruption and legal compliance. Training content will cover the specific requirements of this policy, relevant laws and regulations, and practical case studies.

Monitoring and Audit:

The Company will establish a comprehensive monitoring and audit mechanism to detect and prevent corrupt practices through internal audits, risk assessments, and periodic inspections. Any identified violations will be seriously addressed, and appropriate corrective measures will be taken.

Consequences of Violation:

Employees who violate this policy will be subject to disciplinary action in accordance with the company's rules and regulations and relevant laws and regulations, including but not limited to warnings, fines, demotions, and terminations. Meanwhile, the Company will actively cooperate with law enforcement agencies to pursue legal liabilities against violators.

Policy Communication and Distribution:

This policy will be widely disseminated and promoted through various channels such as the company's website, internal communications, and training courses. All relevant personnel must carefully read, understand, and sign a commitment to abide by this policy to ensure its effective implementation.

Regular Review and Update:

The Company will regularly review and update this policy based on changes in laws and regulations, business development needs, and internal and external audit results to ensure its ongoing effectiveness and applicability.

Yingkou Zhongjie Shida Separator Co., Ltd.

2024.01.12