

## 华晟化工商业行为规范 Walsun Chemical Code of Business Conduct

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为实现华晟化工“成为世界一流贸易及服务提供商”的愿景，及践行“促进化工行业绿色可持续发展”的使命，帮助每位华晟化工员工遵循法律和道德标准，华晟化工特制定《华晟化工商业行为规范》（以下简称《规范》）。每位华晟化工员工均应学习、掌握并遵守《规范》中的各项要求。对于违反《规范》的行为，视为严重违反华晟化工规章制度，将要求严厉整改，直至解除劳动合同，触犯法律者还会受到法律的制裁。

To achieve Walsun Chemical's vision of 'becoming a world-class trading and service provider' and fulfill its mission of 'promoting green and sustainable development in the chemical industry', as well as to help every Walsun Chemical employee comply with legal and ethical standards, Walsun Chemical has established the 'Walsun Chemical Business Code of Conduct' (hereinafter referred to as the '**Code**'). Every employee of Walsun Chemical is expected to study, understand, and comply with the requirements set forth in the **Code**. Violations of the **Code** will be considered a serious breach of Walsun Chemical's rules and regulations, and will be subject to strict rectification, up to and including termination of employment contracts. Those who violate the law will also be subject to legal sanctions.

### 一、 华晟化工商业行为责任 Walsun Chemical's Business Responsibilities

#### 1、 对员工的责任 Responsibility to Employees

任何时候我们都将以正直、诚信、勤勉、廉洁、感恩的态度互相对待彼此。我们尊重来自于全世界不同个人的差异。入职决定应基于商业原因，例如资格、才能及成就，并且遵守国家和地方的劳动法规。

We will always treat each other with integrity, honesty, diligence, integrity, and gratitude. We respect the differences of individuals from all over the world. Employment decisions should be based on business reasons, such as qualifications, talents, and achievements, and comply with national and local labor laws and regulations.

#### 2、 对客户和消费者的责任 Responsibility to Customers and Consumers

我们要确保提供的产品和服务达到合同要求并努力超越客户预期。我们依靠诚信、廉洁与客户建立长期关系。所有的营销与广告应准确与真实，蓄意的误导性信息、对重要事实的遗漏或对竞争者出售的商品做出虚假的评断是永远不可接受的。我们合法地、道德地获取业务，杜绝贿赂和回扣。

We ensure that our products and services meet contractual requirements and strive to exceed customer expectations. We rely on integrity and honesty to build long-term relationships with customers. All marketing and advertising must be accurate and truthful. Intentional misleading information, omission of important facts, or false judgments about competitors' products are never acceptable. We obtain business legally and ethically, prohibiting bribery and kickbacks.

#### 3、 对业务伙伴的责任 Responsibility to Business Partners

与其他公司建立良好关系为华晟化工提供了竞争的优势。但我们不与可能损害华晟化工声誉的公司及个人做生意。我们将避免同故意或一再违反法律的公司做生意。所有与第三方的往来必须遵守法律以及华晟化工的政策。我们不借助第三方实施任何法律或《规范》所禁止的行为。

Building good relationships with other companies gives Walsun Chemical a competitive advantage. However, we do not do business with companies and individuals who may damage Walsun Chemical's reputation. We will avoid doing business with companies that intentionally or repeatedly violate the law. All dealings with third parties must comply with the law and Walsun Chemical's policies. We do not use third parties to carry out any actions prohibited by law or the **Code**.

#### **4、 对社会的责任 Responsibility to Society**

我们服务于社会，致力于以合理价格提供高品质的产品与服务，并且积极地支持我们所在的社会。我们尊重员工的权利，每一名华晟化工员工都有支持社会、慈善事业和政治组织以及选择理想的自由。

We serve society by striving to provide high-quality products and services at reasonable prices and actively supporting the communities in which we operate. We respect the rights of employees, and every Walsun Chemical employee has the freedom to support social causes, charitable organizations, and political groups, as well as to choose their ideals.

#### **5、 对环境的责任 Responsibility to the Environment**

我们重视环境保护，遵守我们从事业务活动所在国家的环境保护法律。华晟化工对保护环境承诺，将我们业务活动对环境的影响减至最小，同时作为化工产品的贸易和服务提供商，我们坚持以可持续的采购作为华晟化工的根本，并以促进行业绿色可持续发展的方式经营我们的业务。

We value environmental protection and comply with environmental protection laws in the countries where we conduct business activities. Walsun Chemical is committed to protecting the environment, minimizing the environmental impact of our business activities. As a trading and service provider of chemical products, we adhere to sustainable procurement as the foundation of Walsun Chemical and operate our business in a way that promotes green and sustainable development of the industry.

#### **6、 对政府的责任 Responsibility to Government**

作为一个有责任心的组织，遵守法律法规是我们的义务。

As a responsible organization, it is our obligation to comply with laws and regulations.

### **二、 华晟化工商业行为规范 Walsun Chemical's Business Conduct Standards**

#### **1、 商业道德规范 Business Ethical Standards**

1) 华晟化工所有员工，无论身处何地，处理问题时必须正直、诚信、廉洁，用正确的方式做正确的事情。

2) 华晟化工所有员工都应学习并践行厚道的方式处事做人：

a. 华晟化工通过为客户创造价值、让客户受益获取合理的利润，并与所有客户建立立足于长远发展的合作关系；

b. 所有决定须立足于华晟化工的长远利益，华晟化工提倡为他人着想，不让客户/合作伙伴吃亏。

3) 必须尊重同事、下属和第三方的权利，不得有歧视、侮辱、诽谤等行为，无论年龄、种族、性别、性倾向、肤色、信仰、宗教、发源国、婚姻、残障等。

1) All employees of Walsun Chemical, regardless of their location, must be honest, trustworthy, and incorruptible when dealing with issues, doing the right things in the right way.

2) All Walsun Chemical employees should learn and practice a honest and benevolent approach in their conduct:

a. Walsun Chemical creates value for customers, benefits customers to obtain reasonable profits, and establishes cooperative relationships with all customers based on long-term development.

b. All decisions must be based on the long-term interests of Walsun Chemical. Walsun Chemical advocates considering others and not letting customers/partners suffer losses.

3) The rights of colleagues, subordinates, and third parties must be respected. Discrimination, insults, defamation, and other such behaviors are prohibited, regardless of age, race, gender, sexual orientation, color, belief, religion, country of origin, marital status, disability, etc.

#### **2、 利益冲突 Conflicts of Interest**

1) 商业决策与行为必须基于华晟化工的长远利益，绝不能出于个人考虑或私下关系的动机。与潜在的或现在的供应商、承包商、客户、竞争者或政府管理者的私人关系，绝不能影响我们代表华晟化工的独立与明智的判断力。

2) 华晟化工所有员工不得私下为华晟化工的任何竞争者、客户、分销商或供应商工作或收取服务费。任何公司之外的活动必须与华晟化工的工作严格区分开，并且不应影响你在华晟化工的工作，且确保不会伤害华晟化工的业务活动。

1) Business decisions and actions must be based on Walsun Chemical's long-term interests and never motivated by personal considerations or private relationships. Personal relationships with potential or current suppliers, contractors, customers, competitors, or government officials must never influence our independent and wise judgment on behalf of Walsun Chemical.

2) All employees of Walsun Chemical must not work privately for any competitors, customers, distributors, or suppliers of Walsun Chemical or charge service fees. Any activities outside the company must be strictly separated from the work of Walsun Chemical and should not affect your work at Walsun Chemical, ensuring that it does not harm the business activities of Walsun Chemical.

### **3、 赠礼、业务招待及贿赂 Gifts, Business Entertainment, and Bribery**

1) 禁止行为：业务过程中不允许接受或给予回扣、个佣以及现金赠与(包括现金红包、存折、转账、线上支付等)；如有特殊情况，必须向公司汇报，由公司酌情决定。

2) 接受礼物：任何人不得接受过分慷慨的礼品。如有不能判断的特殊情况，应与部门负责人汇报，所有礼品均须上交公司。

3) 赠与礼品：为向商业合作伙伴等表示感谢，经部门负责人批准，一些商业情形可以赠与礼品，或为相关方支出适当的差旅、餐饮等费用。但所有这些必须是合法的、合理的。当单人单次赠与的礼品价值超过 1000 元时，必须经由部门负责人批准同意。

1) Prohibited actions: It is not allowed to accept or give kickbacks, individual commissions, and cash gifts (including red envelopes, passbooks, transfers, online payments, etc.) during business processes; if any special circumstance, it must be reported to the company for discretionary decision.

2) Accepting gifts: No one should accept excessively generous gifts. In special circumstances that cannot be judged, it should be reported to the department head, and all gifts must be handed over to the company.

3) Giving gifts: To express gratitude to business partners, with the approval of the department head, some business situations can give gifts or pay for appropriate travel, dining, etc., for the relevant parties. But all of these must be legal and reasonable. When the value of a single gift given to a person exceeds 1000 yuan, it must be approved by the department head.

### **4、 保护华晟化工客户、供应商和其他相关方信息**

#### **Protecting Information of Walsun Chemical's Customers, Suppliers, and Other Relevant Parties**

1) 华晟化工员工不得将华晟化工客户、供应商以及其他相关方的机密信息或版权信息在未经对方许可的情况下公布给其他人。

2) 华晟化工员工在存储信息时必须采用适当的步骤——包括设置安全文档，对电脑或电子媒体设置使用权限，或采用适当的处理策略——防止其他人未经授权使用这些信息。

1) Employees of Walsun Chemical must not disclose confidential or copyright information of Walsun Chemical's customers, suppliers, and other relevant parties to others without their permission.

2) Employees of Walsun Chemical must take appropriate steps when storing information - including setting up secure documents, setting usage permissions for computers or electronic media, or adopting appropriate processing strategies - to prevent others from using this information without authorization.

### **5、 收集竞争信息 Collecting Competitive Information**

1) 华晟化工在收集竞争信息时，必须是合法的。不得侵犯竞争对手的权利，不得披露竞争对手的机密或专有信息。

2) 可以使用公开的信息，如年报、公司网站和出版物、公开演讲和公开营销文档、期刊和杂志上的文章、及其他公共媒体上的申报项目。

3) 如果竞争对手或代表竞争对手的第三方在获取华晟化工信息时的某些行为被认为是不适当的或不道德的，那么同类行为也应该避免。

1) When collecting competitive information, Walsun Chemical must be legal. It must not infringe on the rights of competitors or disclose their confidential or proprietary information.

2) Publicly available information can be used, such as annual reports, company websites and publications, public speeches and marketing documents, articles in journals and magazines, and other public media declarations.

3) If certain behaviors of competitors or third parties representing competitors in obtaining information from Walsun Chemical are considered inappropriate or unethical, similar behaviors should also be avoided.

## 6、诚信公平交易 Integrity and Fair Trading

1) 华晟化工任何员工不得通过操纵、隐瞒、滥用特权信息，歪曲事实，或以其他不公平的方式获取不当利益。

2) 华晟化工严格遵守所有适用的公平竞争的相关法律法规，保证商业公正、公平。

1) No Walsun Chemical employee may obtain improper benefits through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or other unfair means.

2) Walsun Chemical strictly complies with all applicable laws and regulations related to fair competition, ensuring business integrity and fairness.

## 7、业务采购 Business Procurement

1) 采购决定必须从华晟化工的最长远利益出发。供应商赢得华晟化工的生意是基于其产品或服务的适用性、价格、交付时间、质量及可持续表现等。

2) 选择供应商需按相关要求对供应商评定审核，审核未合格的供应商不能选择为合作方。

3) 任何人不得私下与供应商和/或客户签订任何合同或协议。

1) Procurement decisions must be made in the best long-term interests of Walsun Chemical. Suppliers win business with Walsun Chemical based on the applicability, price, delivery time, quality, and sustainable performance of their products or services.

2) Supplier selection requires supplier evaluation and auditing according to relevant requirements. Suppliers who fail the audit cannot be chosen as partners.

3) No one may sign any contracts or agreements privately with suppliers and/or customers.

## 8、商业记录维护 Business Record Maintenance

1) 华晟化工需要诚实、准确地记录和上报信息，以便进行负责的业务决策。

2) 按照制度与流程来记录、保存华晟化工业务记录。只有过了保存的有效期，记录才能销毁。但在未决、诉讼、政府咨询、等待传票或者其他信息查询下，此类记录无论是否过了保存有效期都不得抛弃或销毁。

3) 华晟化工员工永远不得以非正当的理由销毁、更改、隐瞒任何记录，或者不得以个人或联合其他人试图影响、阻止任何正式调查。

1) Walsun Chemical needs to record and report information honestly and accurately for responsible business decisions.

2) Record and preserve Walsun Chemical's business records according to established systems and procedures. Records can only be destroyed after their retention period has expired. However, such records must not be discarded or destroyed, regardless of whether their retention period has expired, in cases of pending matters, litigation, government inquiries, awaiting subpoenas, or other information requests.

3) Employees of Walsun Chemical must never destroy, alter, or conceal any records for improper reasons, nor attempt to influence or prevent any formal investigation individually or in conjunction with others.

## 三、豁免 Exemptions

《规范》适用于所有华晟化工员工，《规范》的任何一部分都不得豁免。除非经过股东会的投票决定某项内容确实需要豁免，同时豁免该项目可以保护华晟化工。

The **Code** applies to all employees of Walsun Chemical, and no part of the **Code** may be exempted. Unless the shareholders' meeting votes to decide that a certain content indeed needs to be exempted, and exempting that item can protect Walsun Chemical.

## 四、违反《规范》的举报渠道和方式 Reporting Channels and Methods for Violations of the Code



1、为搭建畅通的投诉举报渠道，确保本《规范》落到实处，公司指定由总经理领导的绿色可持续发展委员会为专项举报渠道，委员会负责人陈超，举报专线：13517470959，举报专用邮箱 [channel08@qq.com](mailto:channel08@qq.com)；总经理手机号：13507319326，总经理邮箱：[yuguo@china.com](mailto:yuguo@china.com)；

1. To establish a smooth complaint and reporting channel to ensure the implementation of this **Code**, the company designates the Green Sustainable Development Committee, led by the general manager, as the special reporting channel. The person in charge of the committee is Chen Chao, the reporting hotline: 13517470959, the reporting email: [channel08@qq.com](mailto:channel08@qq.com); the general manager's mobile number: 13507319326, the general manager's email: [yuguo@china.com](mailto:yuguo@china.com)

2、如果您发现了使您产生疑虑的行为或者有违反《规范》嫌疑的行为，请立即提出相关问题，这样可以使公司有机会赶在该问题构成违反法律的事实或对健康、安全及公司的声誉构成威胁之前处理和纠正该问题。

2. If you discover behavior that raises doubts or is suspected of violating the **Code**, please raise the issue immediately. This allows the company to address and correct the issue before it becomes a legal violation or poses a threat to health, safety, and the company's reputation.

3、公司严肃认真地对待所有举报，并承诺对所有举报进行保密和全面调查。因某项潜在违反《规范》行为而受到调查的员工在调查人员做出任何最终决定之前可以申诉。

3. The company takes all reports seriously and promises to keep all reports confidential and conduct comprehensive investigations. Employees under investigation for potential violations of the **Code** may appeal before the investigators make any final decisions.

4、《规范》调查可能涉及任何员工，如果涉及到您，需无条件予以全面合作并完全而诚实地回答所有问题。

4. The **Code** investigations may involve any employee, and if you are involved, you must cooperate fully and answer all questions completely and honestly without conditions.

5、公司确保员工不会因任何举报或提供真实信息而遭到报复。员工诚实提出过某项疑虑或参与过某项调查，不得成为对其采取任何不利行动的理由，这些行动包括开除、降职、停职、剥夺权益、威胁、骚扰或歧视。如果您认为某位员工或管理层对您实施了打击报复，请向绿色可持续发展委员会或总经理直接提出。

5. The company ensures that employees will not be retaliated against for any reports or provision of truthful information. An employee's honest raising of a concern or participation in an investigation shall not be a reason for taking any adverse action against them, including dismissal, demotion, suspension, deprivation of rights, threats, harassment, or discrimination. If you believe that an employee or management has retaliated against you, please report directly to the Green Sustainable Development Committee or the general manager.

## 五、 结语 Conclusion

1、本《规范》自公布之日开始执行。本《规范》的执行，旨在确保华晟化工员工在公司内部的行为方式以及与公司外部人士打交道的方式均保持一贯性。公司将对所有华晟化工员工进行培训学习，保证所有华晟化工员工对《规范》的认知、理解和巩固。未能阅读或理解《规范》不能成为华晟化工员工不遵守《规范》的理由。华晟化工保留修改、修订或终止本《规范》的权利。

1. This **Code** takes effect from the date of its publication. The implementation of this **Code** aims to ensure consistency in the behavior of Walsun Chemical employees both within the company and in dealing with external parties. The company will provide training to all Walsun Chemical employees to ensure their awareness, understanding, and reinforcement of the **Code**. Failure to read or understand the **Code** cannot be a reason for Walsun Chemical employees not to comply with the **Code**. Walsun Chemical reserves the right to modify, revise, or terminate this **Code**.

2、如部分内容与《华晟员工手册》有冲突时，以《华晟员工手册》的条款为准。

In the event of any conflict between parts of this **Code** and the 'Walsun Employee Handbook', the provisions of the "Walsun Employee Handbook" shall prevail.