# INTEGRITY AND COMPLIANCE MANUAL

SINOCHEM HOLDINGS

sinochem

# Message from the Chairman

The joint restructuring of Sinochem Group Co., Ltd. ("Sinochem Group") and China National Chemical Corporation Ltd. ("ChemChina") leads to the creation of Sinochem Holdings Corporation Ltd. ( “ Sinochem Holdings ” ). Upon this event, our 220,000 plus colleagues came together into one bigger Sinochem Holdings family to support each other and explore the future in joint hands.

As we have this new identity and new platform, we shall also have new common ideas and goals. On the way of building up a world-leading chemical enterprise, each one of us is key for our success. Sinochem Holdings will provide each and every like-minded colleague with better opportunities and possibilities, so that everyone can strive

Chairman of Sinochem Holdings

# Instructions About the Integrity and Compliance Manual

## Purpose of the Manual

The "integrity and compliance manual" aims to provide fundamental guidelines for the company's operation and management behaviors as well as employees' behaviors, guide employees to perform their duties with standardized behaviors and higher ethical standards, help the company and employees carry out various operation and management activities in accordance with the laws and regulations, form an integrity and compliance culture in which everyone talks about compliance, and show the company's integrity and compliance values to the outside world, establish a good image of the company to

# Relationship between the Company and its Employees

The vitality of the Company comes from the creativity of the staff. We treat our employees as our most valuable resources and business development supporters. We deeply care for our employees by providing them with human resources support and a good circumstance and space for their personal development.

### (1) Hire employees in accordance with law

The Company strictly abides by the labor laws and regulations applicable in the jurisdictions where it carries out business activities, as well as applicable international rules and conventions, such as the Universal Declaration of Human Rights, and the Declaration of Fundamental Principles and Rights at Work, and upholds the principles advocated by the International Labor Organization.

The Company is committed to ensuring that the remunerations of all staf are in line with internationally accepted labor and social standards.

The Company absolutely forbids the employment and use of child labor and resists all forms of forced or compulsory labor.

### (2) Treat employees equally

The Company adheres to equal employment, treats employees of different nationalities, ethnics, races, religions, genders, ages, sexual orientation or marital status or in pregnancy equally, and promotes a diversified and inclusive working circumstance for the employees.



### (3) Safeguard the rights and interests of employees

The Company respects and cares about its employees and makes the best endeavors to safeguard the legitimate rights and interests of the employees. The Company establishes and improves a democratic management system featuring an employee representative congress, guarantees the employees ' rights to know, express and supervise, and pays attention to and actively responds to employees ' demands.

### (4) Assist in employee ' s development

The Company gives weight to the development and cultivation of talents and strives to create a good environment suitable for their growth and development. By establishing a well-organized, sound and effective training system and talent development mechanism, the Company improves the overall abilities and qualities of the employees and helps them grow together with the Company.

### (5) Resolve disputes in accordance with law

The Company encourages and advises the employees to make their demands in a reasonable manner. If an employee thinks that he or she is unfairly treated or that his or her lawful rights and interests are not protected, he or she may promptly bring the issue to the human resources department or legal & compliance department of the Company. Even in case of a dispute, the Company will try to seek solutions for the benef t of both the Company and the employees concerned.

### (6) Maintain a good working environment

The Company provides a friendly, fair and safe work environment for the employees and requests the employees to maintain jointly with the Company. Employees must wear work clothes with labor protection devices at production and working sites as required under the rules of the Company. They should also respect, trust and help each other.

### (7) Anti-discrimination and anti-harassment

The Company does not tolerate any discrimination or harassment. No one is allowed to commit any intimidation, violence, bullying or other similar acts, or insult, discriminate or harass others in words or actions, or spread rumors or other slanderous or discriminatory information.

# Conflict of Interests

Employees should avoid con f icts of their personal interests with those of the Company

# HSE and Product Quality

When it comes to health, safety and environment ( “ HSE ” ), we adhere to the guidelines “ We treat life and the environment as top priority, and adopt losscontrol methodology for achieveing continuous improvement. ” And never fail to incorporate occupational safety, safe production and environment protection as vital parts of the performance of our social responsibilities in the Company ’ s sustainable development scheme. The Company carefully complies with HSE-specific laws and regulations of China and other countries or regions covered by our business and has built an intrinsically safe, eco-friendly and resource e f cient enterprise by the deployment of an HSE management regime f t for the Company and the implementation of systematic, professional and detailed HSE management. The care for life, health and environment

### (4) Tighten the administration of contractors

Since the products and services provided by the contractors of the Company would have direct and significant impact on the Company ' s realization of our quality and HSE goals, the Company requires our entire staff to comply with the mechanism of the Company to select contractors, reinforces the assessment of any candidates ' eligibility, guides all contractors to raise their awareness of the Company ' s requirements of quality and HSE management and requires the contractors to follow relevant rules of the Company when performing their contracts entered with the Company.

When signing a contract with a contractor, the Company shall take into consideration HSE-related requirements and step up the monitoring of the contractor ' s compliance with HSE requirements, and in case of any issue relating to HSE arising during the performance of the contract, the Company shall timely respond.

### (5) Get ready for emergencies

With profound understanding of the importance and necessity of emergency response, the Company keeps improving the contingency plans for the risk rating based on the existing situation, maintains emergency preparedness supplies, organizes emergency responding teams, conducts emergency drills simulating real-world scenarios, and is always ready to anticipate any state of emergency.

The employees should actively participate in the Company ' s emergency drills, be alerted to HSE emergencies, and timely discover, report and dispose of any anomaly. In case of emergency or accident, they shall report the same without delay and promptly take responsive measures.

### (6) Keep improving the quality of products and services

# Business Activities and Market Competition

In business activities, the Company holds fast to principles of honesty, integrity, equal negotiation, mutual benefit and co-development and complies with both business ethics and relevant laws and regulations. The Company participates in competition as per law and puts enterprise integrity and compliance before the economic benefits of the Company, Þ v ƶ la bœth t " a

### (3) Forbid unfair competition

Unfair competition refers to competing with other business operators via violation of law, breach of business ethics, disturbance of market competition order and other misconducts, thus injuring the lawful rights and interests of other business operators or the consumers. When conducting business, the employees should participate in the competition in strict accordance with the Anti-Unfair Competition Law and other laws and regulations applicable to fairness in competition.

### (4) Comply with anti-monopoly laws

The Company persists in competing with the rivals fairly and in compliance with laws and regulation and closely adheres to anti-monopoly laws and regulations, any action in violation of the Anti-monopoly Law or any relevant laws and regulations wi

# Company Asset and Financial Integrity

### (1) Stringently implement financial and tax systems

1. Obey the financial and accounting rules and follow relevant Company audit, review and approval proceedings.

2.Make sure that the financial information and reports are complete, accurate and authentic, and that every employee is bound by financial integrity.

3.Follow rules for management of the financial documents and abide by finance and tax related regulations in the country (region) where business is located.

4.Comply with tax obligations in accordance with law and make disclosure of tax information as per the applicable tax law and regulations in China and any other country (region) where business is operated.

### (2) Properly use and protect assets

Company assets are the material and legal foundation for the Company's sustainable development. Such assets shall only be used for purposes related to Company business, but not for appropriating benefits for any individual in any way.

Employees are obliged to use and dispose of the Company assets in a proper and responsible manner, keep them safe and protect them from any loss or damage.

### (3) Protect intellectual property rights

Intellectu ] h ЦI ] h ɔ

# Information Protection

### (1) Protect con f dential information

The Company shall establish a comprehensive con f dentiality administration system in compliance with all applicable laws and regulations related to con f dentiality, so as to ensure the safety of national secrets and Company ' s business secrets.

Employees should strictly abide by confidentiality related laws and regulations as well as Company rules. Employees must keep confidential of all confidential information disclosed to them by any client or third party or they otherwise might access during daily business operation, under which circumstance, in order to prevent any undesirable disclosure of such information, the level of care exercised by the employees to such con f dential information of any third party to which the Company has con f dential obligation shall be equivalent to that they give to the Company ' s own con f dential information.

### (2) Prohibit insider trading

Divulging insider information or making insider trading is illegal. The Company and its employees are obliged to obey all applicable laws and regulations regarding securities trading. Insider dealing is strictly prohibited, so is disclosure of any insider information, nor shall anyone use such insider information for personal or third party ' s interest.

### (3) Disclose information according to law

Any publication of Company information shall be done by authorized personnel in accordance with relevant rules of the Company. No employee of the Company shall disclose any information to any outsider without prior authorization or approval.

Employees responsible for information disclosure or publication should strictly comply with the content and format prescribed in applicable laws and regulations and rules of regulatory authorities for this purpose, and accurately, completely and timely deliver and disclose such information with absolute authenticity, while ensuring no con f dential information is disclosed.

Employees shall not disclose work related information of the Company, his/her colleagues, clients and him-/herself while using social media for personal purposes.

### (4) Step up cybersecurity management

The Company conducts regular cyber security accreditation, inspection and risk assessment, and formulates cybersecurity incident contingency plan, which, accompanied by timely remedy of, among other things, system vulnerabilities, computer viruses and cyberattacks, effectively protects the Company from any information safety risk.

### (5) Collect and use information in accordance with law

The Company shall be guided by the principal of legality, legitimacy and minimum necessity when gathering, using and dealing with information of any individual including our employees, as well as information relating to the marking, finance, human resources and strategic planning of our business partners and interested parties, and shall install measures of caution to ensure information security. Unless through public channels, any obtaining of the foregoing information shall be authorized in advance.

Employees are forbidden to process, transmit, buy and sell, publicize or provide to another the information they collected, unless it is otherwise permitted by law.

# Report of Violation

For the purpose of discovering and eliminating inappropriate behavior and complaint and protecting employees and the Company from any possible risks or damage caused thereby, employees shall have the obligation to report to their department supervisors or legal department any incompliant or suspiciously incompliant act. When necessary, employees may provide such information in secretive situation or anonymously, and the Company shall review every such report and act accordingly.

The Company grants no tolerance to any retaliation to the individual lodging complaint or report, and upholds a hardline policy against those committing retaliatory acts to employees who report suspected incompliant behavior or individuals who may cause risk to the Company business.

This Manual does not contain an exhaustive list of all non-compliant or dishonest acts, if any employee is not sure whether a certain matter or behavior might violate this Manual or any other regulations, systems of the Company or laws, he/she should consult his/her department supervisor and legal & compliance department without hesitation.

Any questions and further information or requirements regarding this Manual may be submitted to or obtained from the department supervisors or legal & compliance department of Sinochem Holdings.

Sinochem Holdings ' compliance hotline: compliance@sinochem.com

