

# 商业行为准则

## Codes of Business Conduct

中信泰富特钢集团股份有限公司（下称“公司”）以引领中国特钢事业发展为己任，以“为客户创造价值”“为员工创造幸福”“为股东创造利益”“为社会创造财富”为使命，在市场经济活动中正确处理与客户、员工、股东和社会的相互关系，承担相应的责任与角色，与四者互利共赢。

CITIC Pacific Special Steel Group Co., Ltd. (the company) takes it as its responsibility to lead the development of China's special steel industry, with the mission of *creating value for customers, creating happiness for employees, creating benefits for shareholders, and creating wealth for society*. In market economic activities, the Company correctly handles the interrelationships with customers, employees, shareholders, and society, assumes its responsibilities and roles, and achieve mutual benefit with all four parties.

公司为培育“诚信、创新、融合、卓越”的核心价值，塑造“重德、担当、团结、奋斗”精神，规范企业行为，提升企业形象，强化文明取胜的集体竞争意识，加强员工对各项行为准则的认识，健全商业行为风险责任体系，特编制《中信泰富特钢集团股份有限公司商业行为准则》。员工在履行

职务时需增强意识，面对与公司利益存在矛盾或冲突的情况时，公平正直的态度尽职履责，做出符合职业道德的行为。

In order to cultivate the core values of *integrity, innovation, integration and excellence*, shape the spirit of *ethics, responsibility, unity, and struggle*, standardize corporate behavior, enhance corporate image, strengthen the benign collective competitive awareness, strengthen employees' understanding of various behavioral norms, and improve the risk responsibility system for commercial behavior, the Company has formulated the *CITIC Pacific Special Steel Group Co.,Ltd. Business Code of Conduct*. Employees should raise their awareness in fulfilling their responsibilities, when faced with situations that conflict with the Company's benefits, employees should be fair and take actions that are in line with professional ethics.

## 1、 引言

1.1 此政策为本公司及其所有关联公司的商业行为准则（以下简称“准则”）。

1.2 本准则适用于公司所有员工。除本准则相关指引外，其他员工所应遵守的公司政策、制度、程序等相关资料可参见公司发布的公司规章制度、程序、手册或通知等。

1.3 参股公司有关员工须遵守本准则并尽力使共事者遵守相同标准的道德操守及诚信原则。

1.4 公司至少每三年或根据需要更新准则内容，如有修改，将向员工公布。

## 1.Introduction

1.1 This policy is the Code of Business Conduct for the Company and all its affiliated companies (hereinafter referred to as the Code).

1.2 The Code applies to all our employees. In addition to the guide in the Code, other items that employees are required to comply with (such as company policies, regulations, procedures, and other related materials) can be found in the Company's published regulations, procedures, manuals, or notices.

1.3 Employees of participating companies are required to abide by the Code and make every effort to ensure that their colleagues adhere to the same standards of ethical conduct and

integrity principles.

1.4 The Company shall update the content of the Code at least every three years or as needed. All modifications will be made public to employees.

## 2、 名称解释

2.1 一级单位：公司总部各职能部门与一级业务单位统称为一级单位。

2.2 利益：指馈赠、贷款、费用、报酬、职位、受聘、合约、服务、优待、免除应履行的全部或部分义务等。

## 2. Explanation

2.1 First-class unit: All functional departments and first-class business units of the Company headquarters are collectively referred to as first-class units.

2.2 Benefit: Refers to gifts, loan, fees, rewards, position, job opportunities, contracts, services, preferential treatment, exemption from all or part of obligations to be performed, etc.

## 3、 道德及诚信

“诚信”“重德”是公司核心价值、企业精神的一部分。我们应避免涉及任何可导致影响公正处理或被视为存在利益冲突的情况。禁止任何人利用职务谋取不当利益。公司不

会容忍滥用或挪用公司资产。所有与公司业务、客户、供应商及员工有关资料均须保密并保障隐私。

### 3. Ethics and integrity

Integrity and Moral are the core values and part of the spirit of the Company. We should avoid any situation that may affect fair handling or be perceived as having a conflict of the Company's benefit. No one is allowed to use their position to seek improper benefits, and the Company will not tolerate the abuse or misappropriation of company assets. All information related to the Company's business, customers, suppliers, and employees must be kept confidential and protected for privacy.

#### 3.1 贿赂、交际及利益

公司严禁任何形式的贿赂和腐败，不容许任何员工行贿、索贿或受贿，包括向客户、供应商、立法和/或执法单位或其他与公司业务相关的人员索取或提供任何利益；或充当第三方中介以提供、索取或接受任何利益。任何人，无论是否得到上级领导许可，利用职权索取或接受任何形式的利益，均违反公司反腐败、反贿赂相关制度。

#### 3.1 Bribery, Communication, and Benefits

Any form of bribery and corruption is strictly prohibited. The Company does not allow any employee to offer, extort or accept bribes, including soliciting or providing benefits to

customers, suppliers, legislative and/or enforcement agencies or other personnel related to the Company's business, or act as a third-party to offer, extort, or accept any benefits. Anyone, regardless of whether they have obtained permission from their superiors, who uses their authority to extort or accept any form of benefits, will all be considered as violations of the Company's anti-corruption and anti-bribery regulations.

3.1.1 提供利益：无论在任何情况下，员工均不得向其他人或公司提供任何形式的利益，以使对方获得相关业务。物资、设备的供货方视同客户，公司采购人员应严格遵守上述准则。

员工在开展业务时收到的任何佣金、钱款或给予优惠条件及其他利益，应按照本公司的规定执行，并应事先经过单位主要负责人的书面批准。

3.1.1 Providing benefits: under no circumstances should employees offer any benefits to any individual or companies to help others obtain relevant business. Suppliers of materials and equipment are regarded as customers, and procurement personnel of the company shall strictly abide by the above guidelines.

Any commission, money or preferential conditions and other benefits received by employees during the business shall

be implemented in accordance with the provisions of the Company and shall get prior written approval of the principal person.

3.1.2 索取利益：员工不得直接、间接或以任何形式，向与公司业务有关的任何机构或个人索取任何利益。

3.1.2 Soliciting benefits: employees shall not directly, indirectly or in any form, solicit any benefits from any institution or individual related to the Company's business.

3.1.3 接受利益：员工应拒绝客户、供应商或任何与本公司业务有关联的人员提供的利益。避免因收受利益而作出非客观判断或者发生损害公司利益的行为。如果接受了，应向单位主要负责人或者相关部门报告。

3.1.3 Accepting benefits: Employees should refuse benefits from customers, suppliers, or anyone associated with the Company's business, and avoid making non-objective judgment or damaging the interests of the company by accepting benefits. If benefits are accepted, employees should report to the principal person or relevant departments.

## 3.2 处理利益冲突

## 3.2 Handling Conflicts of Interest

### 3.2.1 利益冲突定义

常见的利益冲突情况包括但不限于以下情况：

### 3.2.1 Definitions of Conflicts of Interest

The common conflicts of interest include but are not limited to the following situations:

3.2.1.1 跟任何与公司有业务往来的供应商、服务商或有关人员存在未申报的财务利益 / 交易；

3.2.1.1 Having undeclared financial benefits/transactions with any suppliers, service providers or related personnel who have business dealings with the Company.

3.2.1.2 雇用正为或曾为公司工作的服务商为其本人和 / 或直系亲属工作或提供服务、货品等；

3.2.1.2 Hiring service providers who are working or have worked for the Company to work or provide services, goods, etc. for themselves and/or their immediate family members.

3.2.1.3 因私人理由，向个别供应商、服务商、客户、求职者、下属或上级等提供特殊优待；

3.2.1.3 Provide special preferential treatment to individual suppliers, service providers, customers, job seekers, subordinates, or superiors for personal reasons.

3.2.1.4 员工或其直系亲属（包括父母、子女和配偶）正在从事或考虑从事与公司有利益冲突或可能导致利益冲突的事务、投资或活动；

3.2.1.4 Employees or their immediate family members



(including parents, children, and spouses) are currently engaged in or considering engaging in matters, investments, or activities that have a conflict or may lead to conflict with the Company's benefits.

3.2.1.5 在公司范围内，利用工作时间、公司资产（包括人力资源），进行外部工作；

3.2.1.5 Carrying out external work within the Company by taking advantage of working hours and company assets (including human resources).

3.2.1.6 向公司的竞争对手提供协助；

3.2.1.6 Providing assistance to the Company's competitors

3.2.1.7 私下从事提供或制造与公司存在竞争的服务或商品的相关活动。

3.2.1.7 Privately providing or manufacturing services or goods that compete with the Company.

### 3.2.2 利益冲突申报

员工在履行职责中应当避免利益冲突，对涉及本人、亲属、朋友以及与本人有其他利害关系的业务、投资或活动，员工应予以回避。对所有实际或可预计的利益冲突，员工应及时申报。

### 3.2.2 Declaration of Conflict of Interest

The employees shall avoid conflicts of interest between individuals and the Company, and shall recuse themselves from any business, investment or activity that involves them, their relatives, friends, and those with other interests. The employees shall report all actual or foreseeable conflicts of interest in a timely manner.

3.2.2.1 如员工或其直系亲属已从事或考虑从事与本公司利益可能有冲突或潜在冲突的业务、投资或活动且意识到存在或可能存在与公司的利益冲突，员工必须立刻以书面形式向单位主要负责人报告，同时向公司相关部门提供文件副本。

3.2.2.1 If employees or their immediate family members have engaged in or are considering engaging in a business, investment, or activity that there is or may exist a conflict with the interests of the Company, and realize that the conflict do exist, they must immediately report to the principal in a writing format and provide copies of documents to relevant departments of the company.

3.2.2.2 如员工未能遵守以上要求，可导致严厉的纪律处分，包括考核、降职、开除等。

3.2.2.2 If the employees fail to comply with the above requirements, severe disciplinary punishment may be imposed,

including demotion, dismissal, etc.

### 3.3 礼物及招待

#### 3.3 Gifts and Entertainment

##### 3.3.1 馈赠礼物或提供招待

员工绝不能在可能影响业务伙伴决策、或让他人产生质疑的情况下，向客户或利益相关方赠送任何礼物。除非得到公司批准，员工不应向客户或业务伙伴提供招待。

##### 3.3.1 Providing Gifts or Entertainment

Employees must not give any gifts to stakeholders in situations that may affect official or business partner decisions or raise questions. Unless approved by the Company, employees should not provide entertainment to customers or business partners.

##### 3.3.2 接受礼物或招待

无论赠与者是否有影响公司业务决策的主观意愿，员工及其亲属不得接受客户或业务伙伴所赠与礼物或任何有价值的物品、接受招待。

但在下列情况下，允许员工可酌情接受礼物及款待：

##### 3.3.2 Accepting Gifts or Entertainment

Regardless of whether the giver has a subjective intention to influence the Company's business decisions, employees and

their relatives are not allowed to accept gifts or any valuable items or accept entertainment from customers or business partners.

But in the following situations, employees are allowed to accept gifts and entertainment at their discretion:

3.3.2.1 与馈赠者同时出席的宴会或活动，且消费是合乎常理的，非过于奢华或频繁的宴请或娱乐。如必要，员工应将情况向上级领导报告，避免误会或曲解。

3.3.2.1 When attending a banquet or event with the giver, and the consumption is reasonable, rather than excessively luxurious or frequent banquets/entertainment. If necessary, employees should report the situation to their superiors to avoid misunderstandings or misinterpretations.

3.3.2.2 在正常情况下，可视为礼仪交往的非现金礼物如礼物金额较大，有致违反本准则内容可能的，员工应立即或在活动后立即向上级领导报告并将接受的礼物一并上交公司，公司将依据实际情况进行处理。

3.3.2.2 Under normal circumstances, non-cash gifts that can be considered as ceremonial interactions, such as large gift amounts, may violate the content of the Code. Employees should report to their superiors immediately or instantly after the event and hand over the accepted gifts. The Company will deal

with the gifts.

3.3.2.3 一般情况下，员工不可违规收受现金礼券（含购物卡）。员工如在公务场合的抽奖活动或以公司及其下属单位名义获得现金礼券（含购物卡），则按上述非现金礼物指引进行申报和处理。

3.3.2.3 In general, employees are not allowed to illegally accept cash vouchers (including shopping cards). If employees receive cash gift vouchers (including shopping cards) in the name of the Company and its subsidiaries during official lottery activities, they shall declare and dispose them according to the above noncash gift guidelines.

3.3.2.4 无论金额大小，员工不得过于频繁地接受的礼物或招待，不得参与不恰当的招待或社交活动。

3.3.2.4 Regardless of the amount, employees are not allowed to receive gifts or entertainment too frequently, and to participate in inappropriate entertainment or social activities.

3.3.2.5 为避免利益冲突，公司各级采购部门的员工不适用上述条例。各级采购人员应对一切价值的礼物和招待予以婉拒。但礼物属纪念品性质且价值不高，或为公开活动中赠予参加者的礼物的除外，并按前述非现金礼物指引进行申报和处理。

3.3.2.5 To avoid conflicts of benefit, employees of

procurement departments at all levels of the Company are not subject to the above regulations. Procurement personnel at all levels should politely refuse all gifts and entertainment. Except for gift that is a souvenir with low price, or a gift given to participants in public events. They are declared and processed in accordance with the non-cash gift guidelines described above.

### 3.4 工作时间以外的个人操守

#### 3.4 Personal Conduct Outside of Working Hours

3.4.1 作为上市公司，公司的各项经营管理活动都有可能受到媒体或社会大众关注。因此员工应当注意其本人在工作时间以外的个人操守，包括在个人网络或互联网社交媒体的言论，必须符合法律法规及避免与公司的价值理念有所冲突。我们应竭力避免参与不当的事宜，以确保个人行为不会损害公司声誉。

3.4.1 As a listed company, the various business management activities may receive wide attention from the media or the general public. Therefore, employees should pay more attention to their personal conduct outside of working hours, including their comments on personal networks or social media, which must comply with laws and regulations and avoid conflicts with the Company's values. We should make every

effort to avoid engaging in inappropriate matters to ensure that personal behavior does not harm the Company's reputation.

3.4.2 员工在工作时间以外的私人活动及个人操守，不得影响或妨碍其本人有效地履行工作时间内的的工作，亦不得损害公司商誉及声誉。

3.4.2 Employees' private activities and personal conduct outside of working hours shall not affect or hinder their effective performance during working hours, nor shall they damage the Company's reputation and goodwill.

### 3.5 贷款

#### 3.5 Loan

3.5.1 员工或其直系亲属，不应向其上级、下属、或任何与公司有业务来往的个人或机构，提供贷款或为贷款提供担保，不能接受这些个人或机构的贷款，或通过这些个人或机构的协助接受贷款。

3.5.1 Employees or their immediate family members should not provide loans or guarantees to their superiors, subordinates, or any individuals or institutions with business dealings with the Company. They should not accept loans from these individuals or institutions, or accept loans through their assistance.

3.5.2 向银行或财务机构以其当时公布的市场利率及条款，及按正常商业条款的正常贷款，则不在此限。

3.5.2 Loans to banks or financial institutions at the prevailing published market interest rates and terms, as well as normal commercial terms, are not subject to this restriction.

### 3.6 欺诈

#### 3.6 Fraud

3.6.1 公司严禁任何欺诈活动。

3.6.1 The Company strictly prohibits any fraudulent activities.

3.6.2 欺诈是指盗用公司资源，或利用虚假陈述、不实或欺骗手段从任何人身上获得利益或导致他人蒙受损失。欺诈的范围非常广泛，可包括未经授权而擅自使用和 / 或弃置设备及其他物资、虚报费用申请、伪造财务或非财务数据记录、提供虚假记录及数据作私人或转售用途、甚至盗用物品、金钱、服务及其他。制造虚假记录，如蓄意不实报告利润额、营业额或营运费用、个人数据等，均可视为欺诈。

3.6.2 Fraud refers to theft of company resources, or the use of false statements, falsehoods, or deceptive means to gain benefits from anyone or cause losses to others. The scope of fraud is very broad, which can include unauthorized use and/or



disposal of equipment and other materials, false expense claims, falsification of financial or non-financial data records, provision of false records and data for personal or resale purposes, and even theft of goods, money, services, and others. Making false records can be considered as fraud, such as intentionally reporting false profits, revenue or operating expenses, personal data, etc.

### 3.7 使用公司资产及资源

#### 3.7 Use of Company Assets and Resources

3.7.1 公司的财产及物资，应用于公司业务的正当用途，而不是作为员工私人用途，包括时间、人力资源、资金、车辆、计算机、物料、设备设施、易耗品等。员工不应将公司财产及物资用作不当或非法用途。所有员工均有责任妥善使用公司的财产及物资，并及时报告遗失、损毁及不当或非法用途情况，以采取应对措施。

3.7.1 The property and materials of the Company, including time, human resources, funds, vehicles, computers, materials, equipment and facilities, consumables, etc. shall be used for the legitimate purpose of the Company's business, rather than for the personal use of employees. Employees should not use company property and materials for improper or illegal purposes.

All employees are responsible for the proper use of company property and materials, and timely reporting of loss, damage, and improper or illegal use, so as to take appropriate measures.

3.7.2 员工和 / 或其直系家属不得滥用或在有损公司声誉及商誉的情况下使用由公司提供的任何福利及津贴。

3.7.2 Employees and/or their immediate family members shall not abuse or use any benefits and allowances provided by the Company in a manner that damages the Company's reputation and goodwill.

### 3.8 使用 IT 设施及服务

#### 3.8 Use of IT Facilities and Services

3.8.1 公司 IT 设施及服务供员工在执行职务时使用。公司已制定了信息安全、保密相关规章制度以保障信息安全及完整性。员工使用 IT 设施及服务时，应遵循这些政策和规章制度。

3.8.1 IT facilities and services of the Company are available for the employees to use when performing their duties. The Company has formulated information security policies, as well as series of rules and regulations to guarantee information security and integrity. The employees shall follow these policies, rules and regulations when using IT facilities and services.

3.8.2 IT 部门将在不侵犯员工隐私的前提下, 监控这些设施及服务的使用情况, 以确保员工遵行 IT 规章制度, 违规者将受到处分。

3.8.2 The IT Department will monitor the use of these facilities and services without infringing on the privacy of employees to ensure that employees comply with the rules and regulations on IT, and the violators will be punished.

3.8.3 公司邮件用于公司经营管理目的。员工应按照国家法律法规的规定及社会道德与良俗, 得体地使用该服务。员工不可发送具有诽谤、骚扰、色情、歧视、淫褻、戏弄、欺诈、煽动或其他有悖公序良俗的电邮。

3.8.3 Emails of the Company are used for Company management purposes. The employees shall use the service appropriately according to the national laws and regulations, as well as social ethics and good customs. The employees shall not send emails that are defamatory, harassing, pornographic, discriminatory, obscene, derogatory, teasing, fraudulent, inciting, or other offensive emails.

3.8.4 员工应合法、恰当及有道德地使用公司提供的互联网设施。员工应按照国家法律法规的规定及社会道德与良俗, 恰当地使用此等设施, 不得从互联网下载有悖于公序良俗的资料、非法软件、免费软件或分享软件, 或利用该设施

经营或支持与公司无关或未经公司批准的业务谋取利益。

3.8.4 The employees shall use the Internet facilities provided by the Company in a lawful, appropriate, and ethical manner. The employees shall use these facilities properly according to the national laws and regulations, as well as social ethics and good customs, and shall not participate in online games, download offensive or obscene materials, illegal software, free software from the Internet or share software, or use the facilities to operate or support the businesses that are not related to or approved by the Company for profit.

### 3.9 保密 / 敏感资料

#### 3.9 Confidential/Sensitive Information

3.9.1 除依法律法规规定，员工不论何时均不得违反公司保密相关规定向业务以外的任何人员披露公司任何保密和 / 或敏感资料。

3.9.1 Unless required by laws and regulations, employees shall not disclose any confidential and/or sensitive data of the Company to anyone outside normal businesses.

3.9.2 这些资料和数据包括所有与公司经营有关，以电子形式和 / 或以其他形式如书面、传真或口头等，传述和 / 或保存的数据，包括投标资料、合约价格、投资策略、业务

策略及计划、财务预测、员工及客户资料（包含个人隐私数据）、规章制度、专利权申请、客户数据库、研究及技术数据等。

3.9.2 Such information and data includes all data related to the operation of the Company, which are transmitted and/or saved in electronic forms and/or in other forms like written, fax or oral, etc., including bidding information, contract price, investment strategy, business strategy and plans, financial forecast, employee and customer information (including personal privacy data), rules and regulations, patent applications, customer database, research and technical data, etc.

3.9.3 与公司已有或将有业务往来的外界人员，如客户、服务商、供应商、合作伙伴或任何其他人员等相关及其提供的保密数据均包括在内。

3.9.3 Data related to and provided by external personnel that the Company has or will do business with, such as customers, service providers, suppliers, partners, or any other personnel, etc., are included.

3.9.4 所有获授权接触或管理公司任何数据的员工，必须对有关数据采取足够的保护措施，防止任何相关数据被意外地公开披露、滥用或误用。不当使用数据的例子包括泄露数据以换取金钱或其他回报、为私人利益或目的使用数据、

泄露数据以损害公司的利益、或作任何其他用途而危害或损害公司或其员工的利益与声誉。

3.9.4 All employees authorized to access or manage any data of the Company must take adequate protection measures for relevant data to prevent accidental public disclosure, abuse or misuse of any relevant data. Examples of improper use of data include leaking data in exchange for money or other rewards, use of data for private gains or purpose, disclosure of data to harm the interests of the Company, or for any other purposes that endanger or damage the interests and reputation of the Company or its employees.

### 3.10 遵守法律法规及内部规定

员工在经营公司业务时及在工作时间以外的个人操守，均须遵守所有适用法律法规，公司发出的所有政策、规定。

### 3.10 Compliance with Laws, Regulations, and Internal Rules

Employees are required to comply with all applicable laws and regulations, as well as all policies and regulations issued by the Company in their personal conduct during business operations and outside of working hours.

### 3.11 媒体政策

媒体对公司信息的查询，应由对外沟通负责部门统筹处理。接到媒体查询的员工应联络对外沟通负责部门要求协助。除已获得公司授权的员工外，任何员工均不应代表公司与媒体对话。

### 3.11 Media Policy

Media inquiries about the Company information should be coordinated and handled by the department responsible for external communication. Employees who receive media inquiries should contact the department responsible for external communication for assistance. Except for employees authorized by the Company, no one should represent the Company in dialogue with the media.

### 3.12 公平竞争

公司致力于打造公平、公正、公开的营商环境，确保商业行为透明且公平。员工在对外业务交往中要做到公平参与，不得在业务中舞弊、弄虚作假或有其他不良行为。

### 3.12 Fair Competition

The Company is committed to creating a fair, just and open business environment to ensure transparent and fair business practices. Employees shall participate fairly in external business

dealings and shall not engage in fraud, falsehood or other malpractices in business.

#### 4、 与员工的关系

坚持以人为本，坚持“为员工创造幸福”的企业使命，着力为员工成长发展构建通道、创造条件和营造氛围，深化以结果为导向的“业绩+贡献”激励机制，实现员工和企业共成长，在帮助员工实现自我价值的同时共铸企业愿景。

#### 4. Relationship with Employees

Adhering to the people-oriented approach and the Company's mission of creating happiness for employees, we strive to build channels, conditions, and atmosphere for employee growth and development, deepen the results oriented incentive mechanism of performance and contribution, achieve mutual growth between employees and the Company, and help employees realize their self-worth while co-casting the Company's vision.

##### 4.1 员工隐私

我们尊重员工隐私。员工的个人资料受到保护并保密。我们会避免收集不必要的个人资料。同时，在收集及使用员工个人数据时，我们亦会遵守个人资料（隐私）的相关规定。



## 4.1 Employee Privacy

We respect the privacy of employees. The personal information of employees is protected and kept strictly confidential. We will avoid collecting unnecessary personal information. Meanwhile, we will also comply with relevant regulations on personal information (privacy) when collecting and using the personal information of employees.

## 4.2 平等机会

公司积极提倡平等机会、禁止各种歧视行为，对员工招聘、培训、薪酬、福利及终止合约等事项提供平等的机会。此等机会不受年龄、性别、婚姻状况、种族、国籍、宗教等因素所影响。此外，我们会按员工的贡献、工作表现和技能作出嘉许及奖励。我们是以员工的职位、个人能力和工作表现为客观准则，提供薪酬和培训机会给所有员工。另外，我们不会容许在工作环境内有任何歧视、骚扰、中伤及针对别人（使人受害的歧视）的行为。

## 4.2 Equal Opportunities

The Company actively advocates equal opportunities and prohibits all kinds of discrimination, and provides equal opportunities for employee recruitment, training, salary, benefits, termination of contract, etc. These opportunities are not affected

by such factors as age, gender, marital status, race, nationality, religion, etc. In addition, we will commend and reward employees based on their contributions, performance, and technical ability. We provide salary and training opportunities to all employees by taking their position, personal ability and performance as the objective criteria. In addition, we will not tolerate any form of discrimination, harassment, defamation and acts against others (discrimination that causes harm to others) in the workplace.

#### 4.3 薪酬

我们按职位要求和个人工作表现向员工提供有竞争力的薪酬及福利。我们每年考量员工整体薪酬及福利，以确保在本地市场具竞争力，特别是与有关行业和同类型机构相比。我们会就员工的成就和贡献，进行评估及奖励。

#### 4.3 Compensation

We provide competitive compensation and benefits to employees based on job requirements and individual performance. We consider the overall salary and benefits of our employees every year to ensure competitiveness in the local market, especially compared to relevant industries and similar institutions. We will evaluate and reward employees'

performance based on their achievements and contributions.

#### 4.4 培训及发展

人才培养是公司发展的重要一环。我们投入大量资源，提供有效的培训和发展机会，以确保员工具备所需技能，助力员工和企业共成长，“像办学校一样办工厂”。

#### 4.4 Training and Development

Talent cultivation is an important part of the Company's development. We invest substantial resources to provide effective training and development opportunities to ensure that employees possess the necessary skills and help them grow with the Company. As we say, we run the factory as a school.

#### 4.5 沟通

我们深信沟通是建立互信最有效的方法。因此，我们设立多种沟通渠道，包括一线调研、员工热线及意见箱等。员工应有效地通过这些渠道表达关注的内容，积极与管理层沟通，提出想法及建议。

#### 4.5 Communication

We firmly believe that communication is the most effective way to establish mutual trust. Therefore, we have established multiple communication channels, including frontline research, employee hotlines, and suggestion boxes. Employees should

effectively express their concerns through these channels, actively communicate with management, and propose ideas and suggestions.

#### 4.6 健康与安全

我们致力保障员工的健康和安全。我们遵守所有相关职业健康及安全条例，定期召开安全管理工作会议，为员工提供一个安全健康的工作环境。公司安全环保部制定了安全生产相关规章制度，而员工有责任和义务，保护自己及所有相关人员。

#### 4.6 Health and Safety

We are committed to ensuring the health and safety of our employees. We comply with all relevant occupational health and safety regulations, hold regular safety management meetings, and provide employees with a safe and healthy working environment. The Company's Safety and Environmental Protection Department has formulated rules and regulations on safety production, and employees have the responsibility and obligation to protect themselves and all relevant personnel.

4.6.1 员工在工作期间使用含酒精饮品将违反公司相关规定，违规将依制度进行考核。共同营造一个安全健康的工作环境。

4.6.1 Employees who consume alcoholic beverages during work hours will violate relevant company regulations and will be assessed in accordance with the regulations. Create a safe and healthy working environment together is essential.

4.6.2 员工有责任向其上级汇报，包括但不限于，因饮用含酒精饮品后削弱或影响其正常工作。员工须向上级透露其受酒精及药物影响工作能力的问题，以求纠正该行为和 / 或寻求治疗。

4.6.2 Employees are responsible for reporting to their superiors, including but not limited to, any weakening or impact on their normal work caused by the consumption of alcoholic beverages. Employees are required to disclose to their superiors any issues that affect their work ability due to alcohol and drugs, in order to correct the behavior and/or seek treatment.

4.6.3 任何员工如被发现违反此政策及公司相关规定，将承担对应责任并受到处分。对于自愿寻求解决酒精相关问题的员工，公司提供合理协助及支持。

4.6.3 Any employee found to have violated this policy and relevant company regulations will be held responsible and subject to punishment. For employees who voluntarily seek solutions to alcohol related issues, the Company provides reasonable assistance and support.

## 5、 与客户的关系

我们坚持以客户为中心，坚持“为客户创造价值”的使命。我们建立客户驱动的产品和服务设计，完善快速响应客户需求的组织形式，规范以客户为核心的工作流程，为客户提供卓越产品、整体解决方案、优质服务并创造价值。我们提供高度可靠及安全的服务，细心倾听并适时响应客户的需要。我们确保客户的信息在任何时候都受到保障。客户信息只可以用在商业用途上，而且我们必须确保客户信息是通过合法途径取得。我们每个人均有责任确保向我们提供资料的客户清楚知道他们的资料会被何人访问及如何处理。因此，请遵守以下基本规定：

- 只有获得授权的人可以接触个人资料，且只限于商业用途；
- 所有未经许可的公司内部或外部的人，均无法接触这些客户资料；
- 确保客户资料按照严格限制得到安全保存。

## 5. Customers Relationship

We adhere to the customer-centric approach and our mission of creating value for our customers. We establish customer driven product and service design, improve organizational forms that respond quickly to customer needs,

standardize customer-centric workflows, provide customers with excellent products, overall solutions, high-quality services, and create value. We provide highly reliable and secure services, listen carefully and respond promptly to our customer needs. We ensure that customer information is always protected. Customer information can only be used for commercial purposes, and we must ensure that their information is obtained through legal means. We each have a responsibility to ensure that the clients who provide us with information are aware of who will access their information and how it will be processed. Thus, please comply with the following basic regulations:

- Only authorized individuals can access our customer's personal information, and it is limited to commercial purposes.
- All unauthorized individuals within or outside the Company are unable to access these customer information.
- Ensure that the customer information is securely stored according to strict restrictions.

## 6、与政府及监管机构的关系

我们在与政府及监管机构沟通时，严格遵循适用的法律法规及监管要求，积极配合政府及监管机构合理地进行询问或调查。

## 6. Relationship with Government and Regulatory Agencies

We strictly adhere to applicable laws, regulations, and regulatory requirements when communicating with the government and regulatory agencies, and actively cooperate with them to make reasonable inquiries or investigations.

### 6.1 提倡行为

我们提倡员工：

接到政府或监管机构的调查、访问通知后，立即通知上级领导与相关部门。

要求验证身份、阐明目的，并对调查进行完整准确记录。

现场调查过程全程处于公司成员陪同。

### 6.1 Advocated Behaviors

We advocate for employees to:

Upon receiving an investigation or visit notice from the government or regulatory agency, immediately notify the superior leadership and relevant departments.

Require identity verification, clarification of purpose, and complete and accurate recording of the investigation.

The on-site investigation process is accompanied by the Company members throughout.

### 6.2 反对行为

我们不允许出现如下行为：



抗拒、阻挠政府及监管机构的调查。

提供虚假材料及证据。

贿赂政府及监管机构人员，试图影响调查结果。

## 6.2 Opposed Behaviors

We do not allow the following behaviors:

Resist and obstruct government and regulatory investigations.

Provide false materials and evidence.

Bribe government and regulatory personnel in an attempt to influence the investigation results.

## 7、与供应商和服务商的关系

### 7. Relationship with Suppliers and Service Providers

7.1 公司提倡公平、公开的竞争，致力于与供应商及承包商在互信基础上建立长期发展合作关系。我们会以公平公开为原则采购物料及服务。我们只会与具有共同道德价值及标准的供应商及服务商合作。

7.1 The Company advocates competition based on the principle of fairness and openness, develops and maintains long-term relationships with suppliers and service providers based on mutual trust. We will purchase materials and services based on the principle of fairness and transparency. We will only

cooperate with suppliers and service providers who share common ethical values and standards with us.

## 7.2 公众利益及责任标准

公司致力于为客户、供应商及大众提供最高道德标准的服务及产品供应；以严格的标准以及招标和采购程序采购物料及服务，以保证产品与服务质量，及维持客户、供应商及公众对公司的持续信心，实现互利共赢。

## 7.2 Public Benefit and Responsibility Standards

The Company is committed to providing the highest ethical standards of service and product to customers, suppliers, and the public. We procure materials and services with strict standards on bidding and procurement procedures to ensure the quality of products and services, for the purpose to maintain the continuous confidence of customers, suppliers, and the public in the Company, and achieve a mutual benefit and win-win situation.

## 7.3 沟通与合作

我们重视与供应商及服务商的沟通合作，定期与供应商及服务商进行交流和技术分享，促进与供应商及服务商共同成长、协同发展。

## 7.3 Communication and Cooperation

We attach great importance to communication and

cooperation with suppliers and service providers. We communicate and share technology with our suppliers and service providers regularly to promote mutual growth and collaborative development.

#### 7.4 供应商准则

#### 7.4 Supplier Code of Conduct

供应商及服务商对我们的产品及服务有着重要的支持作用。公司的供应商管理声明及相关制度规定已明确了道德、人权及劳工权利、健康及安全，以及保护环境方面的标准。我们只会与遵守相关声明、制度及规定的供应商及服务商合作。具体参见公司公开的可持续供应链政策声明及供应商管理相关规定。

Suppliers and service providers play an important supporting role in our products and services. The Company's supplier management statement and related regulations have clearly defined the standards of ethics, human rights and labor rights, health and safety, and environmental protection. We will only cooperate with suppliers and service providers who comply with relevant statements, systems, and regulations. For details, you can see the *Policy Statement on Sustainable Supply Chain* and *Supplier Management Regulations* published on the Company official website.

## 8、 对股东及金融机构的责任

投资者期待公司提供可持续的长期增长。我们对股东及金融机构负责，以高透明度的方式披露资料，并按照所有适用的法例和通用的会计标准来处理账户及记录。我们亦不允许内部交易或洗钱活动。

## 8. Responsibilities to Shareholders and Financial Institutions

Investors expect the Company to provide sustainable long-term growth. We are responsible to shareholders and financial institutions, disclosing information in a highly transparent manner, and processing accounts and records in accordance with all applicable laws and common accounting standards. We also do not allow internal transactions or money laundering activities.

### 8.1 提供合法及持续的利益增长

我们致力于长远为股东提供合法及持续的利益增长。除了为股东提高经济利益外，我们亦不断追求环境质素及社会公平，确保长期竞争优势及回报。

### 8.1 Provide Legal and Sustainable Growth of Benefits

We are committed to providing legal and sustainable growth of benefits for shareholders in the long run. In addition

to improving economic benefits for shareholders, we also continuously pursue environmental quality and social equity to ensure long-term competitive advantage and returns.

## 8.2 透明及公开

我们向股东负责。我们须以真实、准确及适时的原则，披露相关及重要的财务与非财务资料。我们以透明及公开的原则披露资料，增加股东对我们的业务、表现及整体财务健全的了解。

## 8.2 Transparency and Publicity

We are responsible to shareholders. We must disclose relevant and important financial and non-financial information in a truthful, accurate, and timely manner. We disclose information in a transparent and open manner to increase shareholders' understanding of our business, performance, and overall financial soundness.

## 8.3 内幕交易

## 8.3 Insider Trading

8.3.1 若员工有任何关于公司或与公司有业务来往的任何其他上市公司的重要信息和/或对股价敏感的非公开数据，员工不得在这些数据公开前，购买或出售上述任何公司或这些上市公司的证券，或将相关信息向他人披露。

### 8.3.1 If an employee has any important information about

the Company or any other listed company that has business dealings with the Company, and/or non-public data sensitive to stock prices, the employee should not purchase or sell any securities of the Company or these listed companies or disclose relevant information to others before these data are made public.

8.3.2 员工应遵守所有有关内部交易的法律条例。任何员工参与内部交易，将会按照公司有关制度予以处罚。同时，公司也将向有关执法机关举报。

8.3.2 Employees shall comply with all laws and regulations related to internal transactions. Any employee who participates in internal transactions will be punished in accordance with the Company's relevant regulations. At the same time, the Company will also report it to relevant law enforcement agencies.

#### 8.4 会计政策及实务

#### 8.4 Accounting Policies and Practices

8.4.1 我们保持完整及适当的会计记录及账目。所有会计记录及按其编制的报告，都必须依照所有适用的法例及会计准则保存及呈报。公司制度已包含有关会计及财务报告的政策和监控准则。

8.4.1 We maintain complete and appropriate accounting records and accounts. All accounting records and reports must be kept and reported in accordance with all applicable laws and

accounting standards. The Company system already includes policies and monitoring standards related to accounting and financial reporting.

8.4.2 所有记录、账户、文件和报告（财务或非财务）必须适当反映交易和事项真实情况。任何员工如有证据或怀疑公司的记录中有任何欺诈行为，必须将事件及相关资料及时上报。

8.4.2 All records, accounts, documents, and reports (financial or non-financial) must appropriately reflect real transactions and items. Any employee who has evidence or suspects any fraudulent behavior in the Company's records must promptly report the incident and relevant materials.

## 9、对环境及社会的责任

我们要对社会负责。我们除了制定环境政策外，亦积极支持并参与各类社区和慈善活动。我们尊重人权，并遵守「世界人权宣言」。

## 9. Responsibility for the Environment and Society

We are responsible to the society. In addition to formulating environmental policies, we also actively support and participate in various community and charitable activities. We respect human rights and abide by the Universal Declaration of Human Rights.

## 9.1 环境政策

公司关注可持续、环境保护和生物多样性保护。我们公布于公司官网的环境政策，已详列我们对保护环境的承诺，包括我们在营运上如何关注环保等。

### 9.1 Environmental Policy

The Company focuses on sustainability, environmental protection, and biodiversity conservation. Our environmental policy which is published on the Company's official website has detailed our commitment to environmental protection, including how we prioritize environmental protection in our operations, etc.

## 9.2 慈善活动与捐款

### 9.2 Charitable and Donations Activities

9.2.1 我们鼓励员工支持和参与社区及有意义的活动，也鼓励员工积极参与由公司或慈善团体举办的慈善活动。

9.2.1 We encourage employees to support and participate in community and meaningful activities, as well as actively participate in charitable activities organized by companies or charitable organizations.

9.2.2 员工可以个人身份向社会或慈善团体捐款，但他们必须明确注明该捐款是以个人名义捐出的。

9.2.2 Employees may donate to social or charitable



organizations in their personal capacity, but they must clearly indicate that the donation was made in the name of the individual.

9.2.3 所有个人的捐赠若会被认为有实际或预计的利益冲突情况，则必须申报。如有疑问，员工可向其上级或上级领导查询。

9.2.3 All individual donations must be declared if they are considered to have actual or anticipated conflicts of benefits. If there are any questions, employees can inquire with their superiors or higher-level leaders.

### 9.3 尊重人权

我们遵守「世界人权宣言」，并会仔细考虑是否与不遵守「世界人权宣言」的国家进行交易或投资。

### 9.3 Respect for Human Rights

We abide by the Universal Declaration of Human Rights and will carefully consider whether to engage in transactions or investments with countries that do not comply with the Universal Declaration of Human Rights.

## 10、 管治文化

所有员工享有法律规定和公司规章制度赋予的权利，公司对这些权利予以尊重和保障。

## 10. Governance culture

All employees enjoy the rights granted by laws and the Company's regulations. The Company respects and safeguards these rights.

### 10.1 遵守行为准则

所有员工都有责任清楚了解遵守本行为准则，也有义务按照程序举报违反准则的行为。任何人违反准则，将会受到相应处分。

### 10.1 Compliance with Code of Conduct

All employees shall have the responsibility to understand and abide by this code of conduct, and are also obliged to report violations of the Code according to the procedures. Anyone who violates the Code will be subject to relevant punishment.

10.1.1 各一级单位负责人应指导其下属明白及应用此准则的原则和要求。此外，公司企业文化践行情况作为员工每年绩效考核的一部分，各一级单位负责人应根据准则要求，为下属做出公平的评价。

10.1.1 The heads of each first-class unit shall guide their subordinates to understand and apply the principles and requirements of the Code. In addition, as part of the employees' annual performance evaluation, the implementation of the Company's corporate culture should be evaluated fairly by the

heads of each first-class unit in accordance with the requirements of the Code.

10.1.2 为确保员工遵守并执行本准则，人力资源部门应在员工入职时对本准则进行培训。

To ensure that employees comply with and implement this Code, the Human Resources department should provide training on the Code upon employee onboarding.

10.1.3 若员工在执行上遇到问题，或有任何意见和建议，应向相关部门提出，以便采取跟进行动。

10.1.3 If employees encounter problems or have any opinions or suggestions during execution, they should raise them to relevant departments for follow-up actions.

## 10.2 违反行为准则的举报和调查

公司期望和鼓励员工及与公司有业务往来的人员（例如：客户、供应商、债权人和债务人）向公司举报任何在财务报告、内部监控或其他事项上可能发生的失当行为、任何实际或疑似违反准则的行为及任何与公司有关的不当或非法行为。

## 10.2 Reporting and Investigation of Violations of the Code of Conduct

The Company expects and encourages employees and those who do business with the Company (for example,

customers, suppliers, creditors and debtors) to report to the Company on any misconduct that may occur with respect to financial reporting, internal monitoring or other matters, any actual or suspected breach of the Code, and any improper or illegal conduct associated with the Company.

#### 10.2.1 举报

##### 10.2.1 Whistle-Blowing Procedures

10.2.1.1 若发现任何实际或怀疑违反行为准则的情况，包括欺诈及非法的行为，应向公司相应主管部门作出书面或口头报告，并提供有关资料。

举报电话：0510-80676699

邮箱：hr@citicsteel.com

邮寄：江苏省江阴市长山大道 1 号中信泰富特钢集团股份有限公司人力资源部

邮编：214429

10.2.1.1 If there is any actual or suspected violation of the Code, including fraudulent and illegal behavior, a written or oral report should be made to the Company's relevant department, and relevant information should be provided.

Hotline: 0510-80676699

Email: hr@citicsteel@163.com

Address: Human Resources Department, CITIC Pacific

Special Steel Group Company Limited, No. 1 Changshan Avenue, Jiangyin City, Jiangsu Province, China

Postal Code: 214429

10.2.1.2 每个举报将被保密。未经举报人同意，其身份将不会被透露，除非适用的法律法规要求，或对公司具有管辖权的任何法院的命令或指令要求。具体见公司《举报管理规定》。

10.2.1.2 Each reporting will be kept confidential. Without the consent of the whistle-blower, his/her identity shall not be disclosed, unless required by applicable laws and regulations, or any order or instructions of the court that has jurisdiction over the Company. Please refer to *Regulations on Reporting Management* for details.

10.2.1.3 我们将竭力保护举报人及收到的举报信息。若举报人提供了真实理由和确切资料，即使该举报最终被证实是不正确或无事实根据，也不可歧视该员工或进行报复与伤害。对举报人的骚扰、歧视、报复与伤害，将被视为严重的不当行为，若被证实，将依公司规定进行处分。具体见公司保密制度。

10.2.1.3 We will do our best to protect the whistleblower and the information received. If the whistleblower provides real reasons and exact information, the employee shall not be

discriminated or retaliated or harmed even if the reporting turns out to be incorrect or unfounded. Harassment, discrimination, retaliation and harm to the whistleblower will be regarded as serious misconduct, which may be disciplined in accordance with the company regulations if confirmed. Please refer to the Company's confidentiality regulations for details.

10.2.1.4 但如举报人因别有用心或为牟取私利而恶意作出失实举报，公司支持被举报人维护权利；涉及公司利益的，公司保留对包括举报人在内的相关人士，采取适当行动的权利；对内部员工按公司有关规定进行处分。

10.2.1.4 However, if the whistleblower makes false reports maliciously because of ulterior motives or for personal gain, the Company shall support the rights of the person who is reported; the Company shall reserve the right to take appropriate actions against relevant persons including the whistleblower if it affect the interest of the Company; internal employees will be subject to punishment according to relevant regulations of the Company.

## 10.2.2 调查

### 10.2.2 Investigation

10.2.2.1 接到任何举报，调查小组均会公正和有效地进行调查。调查的目的评估该举报事项是否确实违反了内部规

章制度和/或行为准则。

10.2.2.1 The investigation team will conduct fair and effective investigation to any report received. The investigation is designed to assess whether the reported matter is a de facto violation of the internal rules and regulations and/or codes of conduct.

10.2.2.2 调查小组完成必要的程序后，根据调查核实的事实，出具调查报告。

10.2.2.2 The investigation team shall issue an investigation report based on the facts verified after completing necessary procedures.

10.2.2.3 在调查期间，被调查的员工可能被停职。

10.2.2.3 During investigation, the employee under investigation may be suspended from his/her job.

### 10.3 违反行为准则的处罚

#### 10.3 Punishment for Violation of Code of Conduct

10.3.1 我们不会容忍任何违反行为准则的行为。任何员工被发现直接或间接违反准则要求，公司将依相关规定进行处分。

10.3.1 We will not tolerate any behavior that violates the Code of Business Conduct. Any employee who is found to be in direct or indirect violation of the Code of Business Conduct will

be subject to punishment in accordance with relevant regulations.

10.3.2 倘若出现涉嫌贪污或对公司不利的其他形式的违法行为，经公司批准，将提交司法机构处理。

10.3.2 In the case of suspected corruption or other forms of illegal behaviors that are detrimental to the Company, it will be submitted to the judicial authorities for processing after approval by the Company.