

SHENZHEN INVESTMENT LIMITED
(the “Company”)

ANTI-CORRUPTION AND BRIBERY POLICY

Objective

The Company and its subsidiaries (collectively the “Group”) are committed to upholding the business philosophy of honesty and trustworthiness, compliance with the law and high-quality services as the core, and strictly abiding by business ethics to prevent corruption and bribery in any business transactions. The purpose of this policy is to set out and provide guidance on the basic standards of conduct in relation to anti-corruption and bribery to which the employees of the Group shall adhere.

Scope

This policy applies to the Group and all directors, executives and employees of the Group (including temporary or contract employees for this purpose) (“Employees”). In this policy, the following terms shall have the meanings set out below:

“Bribery” refers to the act of bribing others by giving them Properties or Other Benefits in order to obtain trading opportunities, competitive advantages, improper commercial interests or other interests.

“Properties or Other Benefits” refers to all economic benefits and catering, transportation, accommodation and other hospitalities that do not conform to commercial practices, including but not limited to providing cash and cash equivalents, benefits, gifts, services, hospitalities, etc.

“Donation” refers to the act of an enterprise to voluntarily giving away the lawful properties it has the right to dispose of at nil consideration to a lawful recipient for the use in a public welfare undertakings that are not directly related to the production and operation activities.

“Funding” refers to the provision of funds to third parties at nil consideration to help them complete specific projects.

The Group will from time to time provide clear management control guidance and approval procedures on matters covered by this policy (the “Administrative Measures on Anti-bribery Compliance”) to Employees through the Group’s intranet for their compliance.

Anti-corruption and Bribery

Employees shall comply with all applicable laws, regulations and rules relating to anti-corruption and bribery, and adhere to the principle of not giving, demanding or accepting any form of Bribery. Employees are strictly prohibited from:

- providing, directly or indirectly, Properties or Other Benefits to any person (other than ceremonial objects that conform to commercial practices and are of symbolic value only);
- soliciting, accepting or receiving, directly or indirectly, any Properties or Other Benefits from any person (other than ceremonial objects that conform to commercial practices and are of symbolic value only); or
- otherwise using illegal or improper means to directly or indirectly influence others’ actions.

Hospitality

- Employees are prohibited from accepting travel and accommodation hospitality. The provision of travel/accommodation hospitality should be appropriate and reasonable and consistent with the commercial practices and business etiquette;
- The provision or acceptance of catering should be appropriate and reasonable and consistent with the business practices and business etiquette;
- The conditions and requirements under Administrative Measures on Anti-bribery Compliance must be satisfied when providing or accepting hospitality, and approval should be obtained in accordance with the applicable rules of the entertainment expenses management of the Group.

Contribution, Donation or Funding

- No Employees shall seek illegal personal gains for third parties through Donation or contribution, or use Donation or contribution as a reward for third parties to obtain business opportunities and competitive advantages for

the Group, or to exert undue influence on third parties so as to obtain business opportunities and competitive advantages for the Group;

- All the external Donation and contribution should be conducted in accordance with the procedures of external Donation of the Group with approval;
- The recipient of external Funding shall be non-profit organization. Provision of Funding should be open and transparent, avoid conflict of interest or be deemed as conflict of interest. All Funding should be made in accordance with the Group's Funding approval procedures.

Hiring of Advisors, Third- party Agents or Intermediaries

Hiring of advisors, third-party agents or intermediaries should be based on reasonable business needs, and satisfy the conditions and requirements of the Administrative Measures on Anti-bribery Compliance and in accordance with the relevant system for selection and hiring of intermediaries of the Group.

Internal Supervision and Inspection

The companies of the Group should strengthen their financial and accounting control system and anti-corruption compliance audit, and conduct random checks on the implementation of the anti-bribery system from time to time in order to prevent or detect any misconduct in a timely manner.

Reporting

If an Employee becomes aware of any actual or suspected violations of this policy, he/she has a duty to report in accordance with the Whistleblowing Policy of the Company. The Whistleblowing Policy provides a mechanism for Employees and individuals who deal with the Group to raise concerns on any suspected impropriety, misconduct or malpractice through confidential reporting channels.

Review of this Policy

The Company will review this policy from time to time.

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