

江苏今世缘酒业股份有限公司

商业道德及供应商反腐败政策

Jiangsu King's Luck Brewery Joint-Stock Co., Ltd.

Business Ethics and Supplier Anti - Corruption Policy

江苏今世缘酒业股份有限公司（以下简称“公司”）严格按照法律法规和道德标准开展生产经营活动，禁止出现任何对公司诚信和声誉产生不良影响的行为。为保障公司诚信廉洁氛围，防范和控制腐败风险，根据《中华人民共和国公司法》《企业内部控制基本规范》等法律法规、规范性文件及《江苏今世缘酒业股份有限公司章程》的有关规定，结合公司实际情况，特制定本政策。

Jiangsu King's Luck Brewery Joint-Stock Co., Ltd. (hereinafter referred to as "the Company") strictly conducts its production and business operations in accordance with laws, regulations, and ethical standards. Any behavior that may have an adverse impact on the Company's integrity and reputation is prohibited. To ensure an atmosphere of integrity and honesty within the Company and to prevent and control corruption risks, this policy is formulated in accordance with relevant laws, regulations, and regulatory documents including the *Company Law of the People's Republic of China*, the *Basic Standards for Enterprise Internal Control*, as well as the relevant provisions of the *Articles of Association of Jiangsu King's Luck Brewery Joint-Stock Co., Ltd.*, and in combination with the actual situation of the Company.

一、适用范围

I. Scope of Application

本政策适用于公司及子公司的所有董事、监事、高级管理人员和全体员工，并积极推动公司商业合作伙伴（如供应商、经销商等）落实相关政策。我们鼓励和支持商业合作伙伴（如供应商、经销商等）坚持诚信合规原则，确立和遵循本政策的行为标准。

This policy applies to all directors, supervisors, senior management personnel, and all employees of the Company and its subsidiaries. The Company will also actively promote its business partners (such as suppliers, distributors, etc.) to implement the relevant policies. We encourage and support business partners (such as suppliers, distributors, etc.) to adhere to the principles of integrity and compliance, and to establish and follow the behavioral standards set forth in this policy.

二、指导监督机构

II. Guiding and Supervising Institution

本政策涉及的商业道德合规内控事项由公司董事会下设的审计委员会负责指导监督。公司审计监察部为本政策的执行机构，负责日常执行本政策，对违反本政策行为进行调查、取证并发布处理结果。

The matters related to the internal control of business ethics compliance covered by this policy shall be under the guidance and supervision of the Audit Committee established by the Board of Directors of the Company. The Audit and Supervision Department of

the Company serves as the executing body of this policy, responsible for the daily implementation of this policy, investigating and obtaining evidence of acts in violation of this policy, and releasing the handling results.

三、内容和规定

III. Content and Provisions

公司员工应廉洁自律，在履职过程中不得利用职务便利索取、暗示要求或收受他人贿赂或获取其他财产利益或者非财产利益，包括但不限于以下内容：

Employees of the Company shall be honest and self-disciplined, and shall not take advantage of their position to solicit, imply or accept bribes or obtain other property interests or non-property interests, including but not limited to the following:

（一）反商业贿赂和反腐败

1. Anti-commercial Bribery and Anti-corruption

公司重视廉洁文化建设，对商业贿赂和腐败“零容忍”。公司强化商业伙伴反商业贿赂和反腐败风险管控，在业务交往中明确反商业贿赂和反腐败声明与要求，抵制商业贿赂。在业务合同签订过程中，要求合作伙伴签订《诚信廉洁协议》。同时，要求全部供应商制定反商业贿赂政策。

The Company attaches great importance to the construction of an integrity culture and adopts a "zero tolerance" attitude towards commercial bribery and corruption. The Company strengthens the risk control and management of its business partners regarding

anti-commercial bribery and anti-corruption. In business interactions, it clearly states the declarations and requirements for anti-commercial bribery and anti-corruption, and resists commercial bribery. During the process of signing business contracts, the Company requires its partners to sign the *Agreement on Integrity and Probity*. In the meantime, all suppliers are required to formulate anti-commercial bribery policies.

（二）反舞弊与公平竞争

2. Anti-fraud and Fair Competition

公司禁止员工及其他利益相关方出现采用欺骗等违法违规的舞弊行为，损害公司利益。严格遵循公平竞争规则，不得为谋取不正当利益向他人行贿，禁止员工私自利用职权或影响力使特定合作方得到特殊待遇。

The Company prohibits its employees and other interested parties from engaging in fraudulent acts, such as deception, which violate laws and regulations and harm the Company's interests. It is necessary to strictly abide by the rules of fair competition. Employees shall not offer bribes to others for the purpose of seeking improper benefits. Additionally, it is prohibited for employees to privately use their positions or influence to grant special treatment to specific cooperative parties.

（三）反洗钱

3. Anti-money Laundering

公司禁止参与或协助任何第三方非法洗钱，公司员工也不得

从事或协助他人从事非法洗钱活动。

The Company prohibits participation in or assistance to any third party in illegal money laundering activities. Employees of the company are also prohibited from engaging in or assisting others in engaging in illegal money laundering activities.

四、教育和培训

IV. Education and Training

公司将对全体员工及经销商、供应商、承包商等利益相关方至少每年开展一次廉政教育和培训，内容包括反贿赂、反贪腐等商业道德相关的法律法规及违反商业道德案件警示教育等，培训方式包括但不限于线上、线下合规培训、材料宣贯等。

The Company will conduct integrity education and training for all employees and interested parties including distributors, suppliers, and contractors at least once a year, including anti-bribery, anti-corruption and other laws and regulations related to business ethics, as well as warning education on cases of violations of business ethics. The training methods include but are not limited to online and offline compliance training, the promotion and implementation of relevant materials, etc.

五、捐款和赞助

V. Donations and Sponsorship

公司可能会提供慈善类的捐款和赞助，以促进社会和谐发展，这种捐款不能用来为公司获取不当利益。公司只会在符合当地法律及惯例下进行合法和合乎道德的慈善捐款。此外，公司不会直

接或间接向政治党派、政治协会和政治候选人提供政治捐赠。

The Company may provide charitable donations and sponsorship to promote the harmonious development of society. Such donations shall not be used to obtain improper benefits for the company. The Company will only make legal and ethical charitable donations in compliance with local laws and practices. In addition, the Company will not provide political donations directly or indirectly to political parties, political associations, and political candidates.

六、举报政策及举报人保护

VI. Whistleblowing Policy and Whistleblower Protection

公司鼓励员工对违反商业道德的行为进行举报，举报人可以采用电话、手机短信、信件、电子邮件、当面口头举报等方式进行举报，所有举报线索公司将按照《举报及举报人保护政策》有关规定受理并处置，并依照有关办法保障举报人的权益，严格保护每个举报人及其相关信息。

The Company encourages employees to report any behavior that violates business ethics. Whistleblowers can report such behavior by means of telephone calls, text messages, letters, emails, or in-person oral reports. All reported clues will be accepted and handled by the Company in accordance with the relevant provisions of the *Whistleblowing and Whistleblower Protection Policy*. The Company will safeguard the rights and interests of whistleblowers in accordance with relevant measures and strictly protect every

whistleblower and their related information.

七、定期审计

VII. Regular Audit

公司结合实际需要，至少每三年一次对公司所有业务开展商业道德相关的审计工作。

In light of its actual needs, the Company conducts audits related to business ethics for all its business operations at least once every three years.

八、修订与审阅

VIII. Revision and Review

公司每年审阅本政策，并在必要时进行修订。

The Company will regularly review this policy annually and make revisions as necessary.