

Business Ethics Policy

商业道德政策

Current Version 当前版本	Effective Date 生效日期
V3.0	Sept. 6, 2025 / 2025年9月6日

1. Purpose 目的

This Policy is intended to regulate the conduct of all employees and business activities of Beijing Aden Hotel Services Co., Ltd., ensuring that the Company upholds high ethical standards in its commercial operations and eliminates all forms of unethical and illegal behavior. By establishing and improving a comprehensive business ethics management system, the Company aims to safeguard its reputation and image, protect the legitimate rights and interests of the Company, its employees, customers, and business partners, and promote healthy and sustainable development.

本政策旨在规范北京埃顿酒店服务有限公司所有员工及业务活动的行为，确保公司在商业运营中坚守高尚的道德标准，杜绝各类不道德及违法违规行为。通过建立健全商业道德管理体系，维护公司的良好声誉。

2. Application and Scope 范围与场合

This Policy applies to all employees of Beijing Aden Hotel Services Co., Ltd., including full-time employees, probationary employees, interns, part-time staff, and all levels of management. It also applies to the Company's subsidiaries, branches, and any individuals representing the Company in business activities. Furthermore, suppliers, business partners, and other relevant parties engaged in business dealings with the Company are expected to comply with the relevant requirements of this Policy during the course of cooperation.

本政策适用于北京埃顿酒店服务有限公司全体员工，包括正式员工、试用期员工、实习生、兼职人员等，以及公司的各级管理层。同时，公司的子公司、分公司及所有代表公司开展业务的人员也需严格遵守本政策。此外，与公司有业务往来的供应商、合作伙伴等相关方，在与公司合作过程中也应遵守本政策的相关要求。

3. Reference Documents 参考文件

United Nations Convention against Corruption (UNCAC) 《联合国反腐败公约》

Anti-Unfair Competition Law of the People's Republic of China 《中华人民共和国反不正当竞争法》

ISO 37001:2016 – Anti-bribery management systems – Requirements with guidance for use

ISO 37001:2016 《反贿赂管理体系 要求及使用指南》

Information security technology — Personal information security specification (GB/T 35273-2020)

《信息安全技术 个人信息安全规范》 (GB/T 35273-2020)

4. Responsibilities 职责

Management Level: The management is responsible for approving this Business Ethics Policy and its related systems, and for providing the necessary resources to support its implementation.

Management shall lead by example in complying with the policy, oversee and guide the company's business ethics practices, and ensure the effective enforcement of the policy.

管理层：负责审批本商业道德政策及相关制度，为政策的实施提供必要的资源支持。带头遵守本政策，对公司的商业道德管理工作进行监督和指导，确保政策得到有效执行。

Legal Department, HR Department: As the primary department responsible for this Business Ethics Policy, the Legal Department shall be in charge of drafting, revising, interpreting, and promoting the policy. It shall organize business ethics training, monitor policy implementation, investigate and handle violations, and collect and analyze information related to business ethics to support decision-making by the management.

法务部门、人力资源部门：作为本商业道德政策的主要负责部门，负责政策的制定、修订、解释和推广工作。组织开展商业道德培训，监督政策的执行情况，对违反政策的行为进行调查和处理。同时，收集和分析与商业道德相关的信息，为公司管理层提供决策支持。

All Functional Departments: Each business unit shall strictly comply with the provisions of this policy, strengthen the education and management of its employees regarding business ethics, and promptly identify and rectify any violations within the department. A designated liaison shall be appointed to coordinate with the Legal Department on matters related to business ethics.

各职能部门：严格遵守本政策的各项规定，加强对本部门员工的商业道德教育和管理，及时发现和纠正本部门存在的违反政策的行为。指定专人作为商业道德联络员，负责与法务部门沟通协调相关工作。

IT Department: The IT Department shall be responsible for ensuring the security of the company's information systems, implementing necessary technical measures to protect information assets, and preventing data leakage, tampering, or destruction. It shall cooperate with the Legal Department and HR Department in handling violations related to information security.

IT 部门：负责保障公司信息系统的的核心安全，采取必要的技术措施保护公司信息资产，防止信息泄露、篡改和破坏。配合法务部门与人力资源部门处理与信息安全相关的违规行为。

5. Review and Update 审查与更新

Review Cycle: This Business Ethics Policy shall be reviewed at least once annually, led by the Legal Department with the cooperation of relevant departments. In the event of significant changes in national laws and regulations, notable shifts in the industry environment, or major adjustments to the company's strategic direction, a timely review shall be conducted.

审查周期：本商业道德政策应至少每年审查一次，由法务部门牵头，各相关部门配合完成。如遇国家法律法规重大调整、行业环境发生显著变化或公司战略进行重大调整等情况，应及时进行审查。

Review Content: Evaluate the applicability, effectiveness, and compliance of the policy; assess the achievement of quantitative targets; analyze issues and deficiencies encountered during policy implementation; and collect feedback from departments, employees, and other stakeholders.

审查内容：评估政策的适用性、有效性和合规性，检查各项量化目标的完成情况，分析政策执行过程中存在的问题和不足，收集各部门、员工及相关方的反馈意见。

Update Mechanism: Based on the review findings, if any part of the policy is deemed inconsistent with the company's development or actual conditions, the Legal Department shall organize revisions. The revised policy shall be circulated for comments among relevant departments and submitted to the company's management for approval. Upon approval, the updated policy shall be promptly communicated to all employees and stakeholders, accompanied by training sessions to ensure full understanding of the changes.

更新机制：根据审查结果，若发现政策存在不适应公司发展或不符合实际情况的内容，由法务部门组织修订，修订后征求各相关部门意见，报公司管理层审批。审批通过后，及时向全体员工及相关方发布更新后的政策，并组织培训，确保各方了解政策的变化。

Documentation and Recordkeeping: The review and update process, along with its outcomes, shall be documented in writing. This includes review reports, revision notes, and approval documents. The Legal Department shall be responsible for archiving these records, which shall be retained for no less than five years.

记录保存：政策审查和更新的过程及结果应形成书面记录，包括审查报告、修订说明、审批文件等，由法务部门负责存档保存，保存期限不少于 5 年。

6. Definition 定义

Anti-Corruption and Anti-Bribery: Refers to the prohibition of employees and related parties from soliciting, accepting, or offering improper benefits in any form that may influence legitimate business decisions or result in undue advantage.

反腐败反贿赂：指禁止公司员工及相关方以任何形式索取、收受或给予不正当利益，以影响正常的商业决策或获取不当利益的行为。

Anti-Money Laundering: Refers to a series of measures aimed at preventing the concealment or disguise of the origin and nature of proceeds derived from illegal activities, including drug trafficking, organized crime, terrorism, smuggling, corruption and bribery, financial misconduct, and fraud.

反洗钱：指采取一系列措施，防止通过各种方式掩饰、隐瞒毒品犯罪、黑社会性质的组织犯罪、恐怖活动犯罪、走私犯罪、贪污贿赂犯罪、破坏金融管理秩序犯罪、金融诈骗犯罪等的违法所得及其收益的来源和性质的洗钱活动。

Anti-Fraud: Refers to the prevention of fraudulent activities by employees, clients, suppliers, or other stakeholders, including deception or concealment, intended to obtain improper benefits or cause losses to the company.

反欺诈：指防止公司员工、客户、供应商等相关方通过欺骗、隐瞒等手段，获取不正当利益或使公司遭受损失的行为。

Conflict of Interest: Refers to situations where personal or organizational interests conflict or potentially conflict with the interests of the company, which may lead to biased decision-making that prioritizes private interests over corporate interests.

利益冲突：指个人或组织的私人利益与公司利益之间存在的矛盾或潜在矛盾，可能导致个人或组织在决策过程中优先考虑私人利益，而损害公司利益。

Information Security: Refers to the protection of the company's information assets—including customer data, trade secrets, and financial information—from unauthorized access, use, disclosure, alteration, or destruction, ensuring the confidentiality, integrity, and availability of information.

信息安全：指保护公司的信息资产，包括客户信息、商业秘密、财务数据等，防止其被未经授权的访问、使用、披露、修改或破坏，确保信息的保密性、完整性和可用性。

7. Content 内容

Anti-Corruption and Anti-Bribery 反腐败反贿赂

1. Adhere to the principles of fairness, impartiality, and transparency in business operations, and firmly resist any form of corruption or bribery to foster a clean and trustworthy business environment.

坚持公平、公正、透明的商业运作原则，坚决抵制任何形式的腐败和贿赂行为，营造廉洁、诚信的商业环境。

2. The company is committed to strictly complying with all applicable anti-corruption and anti-bribery laws and regulations in all business activities. It shall neither offer improper benefits to any organization or individual, nor accept any form of improper benefits. Any violations of this commitment will be dealt with seriously in accordance with relevant laws and internal policies.

公司承诺在所有商业活动中严格遵守反腐败反贿赂相关法律法规，不向任何单位或个人提供不正当利益，也不接受任何形式的不正当利益。对违反此承诺的行为，将依法依规严肃处理。

3. The company strictly prohibits all forms of corruption and bribery, including but not limited to employees soliciting or accepting improper benefits such as cash, gifts, kickbacks, commissions, or travel from clients, suppliers, or other related parties.

公司严禁任何形式的腐败和贿赂行为，包括但不限于员工索取或收受客户、供应商等相关方的现金、礼品、回扣、佣金、旅游等不正当利益。

4. Employees are prohibited from offering improper benefits to any organization or individual in order to obtain business opportunities, preferential terms, or other advantages.

禁止员工为了获取业务机会、优惠条件等，向相关单位或个人提供不正当利益。

5. In business dealings, the company shall adhere to the principles of fairness, impartiality, and openness, and must not use improper means to exclude or suppress competitors.

公司在业务往来中，应坚持公平、公正、公开的原则，不得通过不正当手段排挤竞争对手。

6. For business activities involving government departments, the company shall strictly comply with relevant laws and regulations, follow proper procedures and channels, and must not engage in any form of corruption or bribery.

对于涉及政府部门业务，应严格遵守相关法律法规，按照正常的程序和渠道办理，不得进行任何形式的腐败和贿赂活动。

Anti-Money Laundering 反洗钱

1. Strictly comply with all applicable anti-money laundering laws and regulations, establish a sound internal control mechanism for anti-money laundering, effectively identify and prevent money laundering risks, and safeguard financial order and the company's reputation.

严格遵守反洗钱相关法律法规，建立健全反洗钱内部控制机制，有效识别和防范洗钱风险，维护金融秩序和公司声誉。

2. The company is committed to strengthening customer identification and transaction monitoring, reporting large and suspicious transactions in a timely manner, refraining from participating in any form of money laundering, and actively cooperating with regulatory authorities in anti-money laundering efforts.

公司承诺加强对客户身份的识别和交易监控，及时报告大额交易和可疑交易，不参与任何形式的洗钱活动，积极配合监管部门的反洗钱工作。

3. The company shall establish and improve internal anti-money laundering control systems, strengthen customer identification and verification processes, and gain a clear understanding of the source and intended use of customer funds.

公司建立健全反洗钱内部控制制度，加强对客户身份的识别和验证，了解客户的资金来源和用途。

4. Large and suspicious transactions shall be reported in a timely manner to the Anti-Money Laundering Monitoring and Analysis Center of the People's Bank of China, in accordance with applicable regulations.

对大额交易和可疑交易，应按照规定及时向中国人民银行反洗钱监测分析中心报告。

5. It is strictly prohibited to provide any form of facilitation for money laundering or to assist customers in concealing or disguising the origin and nature of illegal proceeds.

严禁为客户提供任何形式的洗钱便利，不得协助客户掩饰、隐瞒违法所得及其收益的来源和性质。

6. Strengthen anti-money laundering training for employees to enhance their awareness and ability to identify and respond to money laundering risks.

加强对员工的反洗钱培训，提高员工的反洗钱意识和识别能力。

Anti-Fraud 反欺诈

1. The company shall adhere to the principle of honesty and integrity, strictly prohibit all forms of fraudulent conduct, protect the legitimate rights and interests of the company and its stakeholders, and maintain orderly and lawful business operations.

秉持诚实信用的原则，杜绝任何形式的欺诈行为，保护公司和相关方的合法权益，维护公司的正常经营秩序。

2. The company is committed to a zero-tolerance policy toward fraudulent conduct. It shall strengthen the management and oversight of employees, clients, and suppliers, promptly detect and investigate fraudulent activities, and take appropriate actions to recover any resulting losses.

公司承诺对欺诈行为采取零容忍态度，加强对员工、客户和供应商的管理和监督，及时发现和查处欺诈行为，挽回公司损失。

3. Employees shall provide truthful and accurate information and are strictly prohibited from misreporting, concealing, or falsifying data or documents.

公司员工应如实提供各类信息，不得虚报、瞒报、伪造数据或文件。

4. Employees are strictly prohibited from abusing their positions to misappropriate company assets, embezzle company funds, or falsely claim expenses.

禁止员工利用职务之便，侵占公司财产、挪用公司资金、虚报费用等。

5. The company shall implement strict management and oversight of clients and suppliers to prevent them from fraudulently obtaining goods, services, or funds from the company.

对客户和供应商进行严格管理，防止其通过欺诈手段骗取公司的货物、服务或资金。

Conflict of Interest 利益冲突

1. Employees shall prioritize the lawful interests of the Company, promptly identify and address any conflicts of interest, and ensure that personal interests do not exert improper influence over their professional conduct. All decisions must be made from a fair and impartial standpoint.

优先维护公司利益，及时识别和处理利益冲突，确保员工在工作中不受私人利益的不当影响，保持公正的决策立场。

2. The Company is committed to establishing a formal mechanism for the disclosure and management of conflicts of interest. Employees are required to truthfully report any actual or potential conflict of interest, and the Company shall take effective measures to eliminate or mitigate related risks.

公司承诺建立利益冲突申报和管理机制，要求员工如实申报可能存在的利益冲突情况，并采取有效措施消除或降低利益冲突风险。

3. Employees shall proactively disclose any potential conflicts of interest, including but not limited to personal investments, external employment, and familial relationships, that may have an impact on the lawful interests of the Company.

公司员工应主动申报可能存在的利益冲突情况，包括个人投资、兼职、亲属关系等可能影响公司利益的事项。

4. In cases where a conflict of interest exists, employees shall take appropriate recusal measures and must not participate in any related decision-making or business activities.

对于存在利益冲突的情况，员工应采取回避措施，不得参与相关的决策和业务活动。

5. The Company's management shall regularly review and assess all conflict of interest disclosures submitted by employees. Where necessary, appropriate measures shall be taken to eliminate or mitigate the risks arising from such conflicts.

公司管理层应定期对员工申报的利益冲突情况进行审查和评估，采取必要的措施消除或降低利益冲突带来的风险。

6. Employees are strictly prohibited from using Company resources to seek improper benefits for themselves or their relatives. Employees shall not hold part-time positions or engage in business activities with any entity that is in competition with the Company.

禁止员工利用公司资源为个人或亲属谋取不正当利益，不得在与公司有竞争关系的单位兼职或从事相关业务。

Information Security 信息安全

1. The Company regards information security as a strategic and vital corporate asset, and is committed to implementing comprehensive security protection measures to ensure the confidentiality, integrity, and availability of information. All necessary actions shall be taken to prevent information leakage and misuse.

将信息安全视为公司的重要资产，采取全面的安全防护措施，保障信息的保密性、完整性和可用性，防止信息泄露和滥用。

2. The Company is committed to establishing and maintaining a comprehensive information security management system, enhancing employee training on information security, and adopting advanced technological measures to protect the Company's information asset, the Company shall ensure timely response and handling of information security incidents

公司承诺建立健全信息安全管理体系统，加强对员工的信息安全培训，采取先进的技术手段保护公司信息资产，对信息安全事件及时响应和处理。

3. Employees shall not disclose customers' sensitive personal information, including but not limited to identification numbers and contact details, to any unauthorized external parties.

员工不得将客户的身份证信息、联系方式等敏感信息泄露给外部无关人员。

4. Employees are strictly prohibited from copying or removing the Company's core confidential business documents without prior authorization.

严禁员工未经授权，擅自拷贝公司的核心商业机密文件并带离公司。

5. Employees shall strictly comply with the Company's information security management policies, and ensure the proper safeguarding of the Company's information assets. It is strictly prohibited to disclose any confidential business information, customer data, or other sensitive content to unauthorized parties.

公司员工应严格遵守信息安全管理规定，妥善保管公司的信息资产，不得泄露公司的商业秘密、客户信息等敏感信息。

6. The Company shall enhance access control mechanisms for its information systems. Employees are permitted to access only the information that is necessary for the performance of their job responsibilities, any unauthorized access, use, or modification of data within the information systems is strictly prohibited.

加强对信息系统的访问控制，员工只能访问其工作职责所必需的信息，严禁未经授权访问、使用或修改信息系统中的数据。

7. Regular security inspections and maintenance shall be conducted on information systems to promptly identify and fix security vulnerabilities, and to prevent attacks and damage to the systems.

定期对信息系统进行安全检测和维护，及时发现和修复安全漏洞，防止信息系统遭受攻击和破坏。

8. Customer personal information shall be collected, used, stored, and protected in accordance with applicable laws and regulations, to ensure the security of such information.

对于涉及客户个人信息的，应按照相关法律法规的要求进行收集、使用、存储和保护，确保客户信息的安全。

Quantifiable Targets 量化目标

Anti-Corruption and Anti-Bribery Target 反腐败反贿赂目标

Sustained Target: 2024-2028

持续目标：2024 年-2028 年

Target 1.1: Ensure 100% annual coverage of anti-corruption and anti-bribery training for newly hired employees during the period from 2024 to 2028.

目标 1.1：2024 年至 2028 年期间，确保新入职员工每年反腐败反贿赂培训覆盖率达到 100%。

Target 1.2: Using 2024 as the baseline year, ensure that employee awareness of the anti-corruption and anti-bribery policy increases year by year, reaching 100% by 2028.

目标 1.2：以 2024 年为基准年，确保全体员工对反腐败反贿赂政策的知晓率逐年递增，至 2028 年达到 100%。

Target 2: Ensure zero occurrence of corruption and bribery cases each year.

目标 2：确保每年腐败贿赂案件发生为零。

Anti-Money Laundering Target 反洗钱目标

Ongoing Target: 2024-2028

持续目标：2024 年-2028 年

Target 1: Ensure 100% accuracy in reporting large-value transactions and suspicious transactions annually.

目标 1: 确保每年大额交易和可疑交易报告准确率达到 100%。

Target 2.1: Ensure 100% coverage of anti-money laundering training for newly onboarded employees annually during the period from 2024 to 2028.

目标 2.1: 2024 年至 2028 年期间, 确保新入职员工每年反洗钱培训覆盖率达到 100%。

Target 2.2: Based on the year 2024 as the baseline, ensure the awareness rate of anti-money laundering policies among all employees increases year by year, reaching 100% by 2028.

目标 2.2: 以 2024 年为基准年, 确保全体员工对反洗钱政策的知晓率逐年递增, 至 2028 年达到 100%。

Anti-Fraud Target 反欺诈目标

Ongoing Target: 2024-2028

持续目标: 2024 年-2028 年

Target 1: Ensure zero occurrence of fraud incidents annually.

目标 1: 确保每年欺诈事件零发生。

Target 2.1: Ensure 100% coverage of anti-fraud training for newly onboarded employees annually during the period from 2024 to 2028.

目标 2.1: 2024 年至 2028 年期间, 确保新入职员工每年反欺诈培训覆盖率达到 100%。

Target 2.2: Based on the year 2024 as the baseline, ensure the awareness rate of anti-fraud policies among all employees increases year by year, reaching 100% by 2028.

目标 2.2: 以 2024 年为基准年, 确保全体员工对反欺诈政策的知晓率逐年递增, 至 2028 年达到 100%。

Information Security Target 信息安全目标

Ongoing Target: 2024-2028

持续目标: 2024 年-2028 年

Target 1: Ensure zero occurrence of major information security incidents annually.

目标 1: 确保每年重大信息安全事件零发生。

Target 2.1: Ensure 100% coverage of information security training for newly onboarded employees annually during the period from 2024 to 2028.

目标 2.1: 2024 年至 2028 年期间, 确保新入职员工每年信息安全培训覆盖率达到 100%。

Target 2.2: Based on the year 2024 as the baseline, ensure the awareness rate of information security policies among all employees increases year by year, reaching 100% by 2028.

目标 2.2: 以 2024 年为基准年, 确保全体员工对信息安全政策的知晓率逐年递增, 至 2028 年达到 100%。

8. Disciplinary Measures 惩戒措施

For employees who violate this Business Ethics Policy, the Company shall impose the following disciplinary actions based on the severity of the misconduct:

对于违反本商业道德政策的员工, 公司将根据情节轻重采取以下惩戒措施:

Verbal Warning: Applicable to minor violations. The employee will receive verbal criticism and education, and be required to make immediate corrections.

口头警告: 适用于情节轻微的违规行为, 对员工进行口头批评教育, 要求其立即改正。

Written Warning: Applicable to relatively minor violations. The misconduct will be documented in the employee's personnel file, and a formal written warning will be issued.

书面警告: 适用于情节较轻的违规行为, 将违规情况记录在员工档案中, 并给予书面警告。

Demotion and Salary Reduction: Applicable to more serious violations. The employee will be subject to demotion and corresponding reduction in compensation.

降职降薪: 适用于情节较严重的违规行为, 对员工进行降职处理, 并相应降低其薪资待遇。

Termination of Employment Contract: Applicable to serious violations that cause significant loss to the Company or severely impact its reputation. The employment contract will be terminated immediately without any financial compensation.

解除劳动合同: 适用于情节严重、给公司造成重大损失或严重影响公司声誉的违规行为, 立即与员工解除劳动合同, 并不给予任何经济补偿。

Economic Compensation: Employees shall bear corresponding compensation liability for any economic loss caused to the Company due to their misconduct.

经济赔偿: 对于因违规行为给公司造成经济损失的, 员工应承担相应的赔偿责任。

Legal Liability: For violations suspected of constituting criminal offenses, the Company will refer the case to judicial authorities for legal prosecution in accordance with the law.

法律追究：对于涉嫌违法犯罪的违规行为，公司将移交司法机关处理，依法追究其法律责任。

For suppliers, partners, and other relevant parties who violate this Policy, the Company shall take appropriate actions based on the severity of the misconduct, including issuing warnings, suspending cooperation, or terminating cooperation, and record the misconduct in the partner's file.

对于违反本政策的供应商、合作伙伴等相关方，公司将视情节轻重采取警告、暂停合作、终止合作等措施，并将其不良行为记录在合作方档案中。

9. Report 举报

Reporting Channels 举报渠道

Telephone Reporting: 021 - 5465 7968-717

电话举报：021 - 5465 7968-717

Email Reporting: HQ.ethics@adenservices.com

邮箱举报：HQ.ethics@adenservices.com

Written Reporting: Send by mail to the Company's Legal Department at the following address – Global Headquarters of Aden Group, Modern Building, No. 218 Xiangyang South Road, Xuhui District, Shanghai. Recipient: Reporting Officer, Legal Department.

书面举报：邮寄至公司法务部门，地址：上海市徐汇区襄阳南路 218 号现代大厦 埃顿集团全球总部，收件人：法务部门举报处理专员。

Reporting Requirements 举报要求

The whistleblower shall truthfully provide reporting information, including the name and department of the reported individual, specific details of the misconduct, and relevant evidence.

举报人应如实提供举报信息，包括被举报人的姓名、部门、违规行为的具体情况及相关证据等。

Handling Procedures 处理流程

Upon receipt of a report, the Legal Department shall conduct a preliminary verification within three working days to determine whether the case will be accepted.

法务部门在收到举报后，应在 3 个工作日内进行初步核实，决定是否受理。

For accepted reports, the investigation shall be completed within 15 working days. For complex cases, the period may be extended to 30 working days.

对受理的举报，应在 15 个工作日内完成调查，情况复杂的可延长至 30 个工作日。

After the investigation is concluded, a decision shall be made based on the findings, and the result shall be communicated to the whistleblower in an appropriate manner, if necessary.

调查结束后，根据调查结果作出处理决定，并将处理结果以适当方式反馈给举报人（如需）。

Protection Measures 保护措施

The Company shall strictly maintain the confidentiality of whistleblower information and strictly prohibit the disclosure of the whistleblower's identity. Any act of retaliation against a whistleblower, once verified, will be dealt with seriously.

公司对举报人的信息严格保密，严禁泄露举报人身份。对打击报复举报人的行为，一经查实，将严肃处理。

10. Record Form 相关记录表单

Business Ethics Policy Commitment Letter 商业道德政策承诺书

As an employee of Beijing Aden Hotel Services Co., Limited (BAHS), I solemnly commit:

本人作为北京埃顿酒店服务有限公司的员工，郑重承诺：

Strictly comply with the Company's Business Ethics Policy and related provisions, and understand and acknowledge all requirements set forth therein.

严格遵守公司《商业道德政策》及相关规定，理解并认同政策中的各项要求。

Uphold the bottom line of business ethics in the course of work, and refrain from participating in any form of corruption, bribery, money laundering, fraud, or other illegal or non-compliant activities.

在工作中坚守商业道德底线，不参与任何形式的腐败、贿赂、洗钱、欺诈等违法违规行为。

Proactively disclose any potential conflicts of interest and take effective measures to prevent such conflicts from harming the interests of the Company.

主动申报可能存在的利益冲突，采取有效措施避免利益冲突对公司利益造成损害。

Strictly comply with the information security management regulations, safeguard the security of the Company's information assets, and refrain from disclosing the Company's trade secrets and customer information.

严格遵守信息安全管理规定，保护公司信息资产安全，不泄露公司商业秘密和客户信息。

Actively participate in business ethics training organized by the Company to enhance personal ethical awareness and conduct.

积极参与公司组织的商业道德培训，提高自身商业道德素养。

Promptly report any violations of the Business Ethics Policy to the Company's Legal Department upon discovery.

如发现违反商业道德政策的行为，及时向公司法务部门举报。

In the event of any violation of this Commitment Letter or the Company's Business Ethics Policy, I agree to accept disciplinary actions imposed by the Company in accordance with relevant regulations, including but not limited to warnings, demotion, and termination of the labor contract. If any loss is caused to the Company, I shall bear the corresponding compensation liability; if the violation constitutes a suspected criminal offense, I shall bear the corresponding legal liability.

若违反本承诺书及公司商业道德政策，愿意接受公司依据相关规定作出的惩戒处理，包括但不限于警告、降职、解除劳动合同等，给公司造成损失的，承担相应的赔偿责任；涉嫌违法犯罪的，承担相应的法律责任。

Commitment Signatory (Signature) 承诺人（签字）： _____

Department 所属部门： _____

Date 日期： ____ Year 年 ____ Month 月 ____ Day 日