

# **ZJLD Group**

## **Code of Business Conduct**

Version: A/0

Prepared by: ESG Management Department

Reviewed by: CEO

Approved by: Board of Directors

# **Chapter 1: General Provisions**

## **Article 1**

ZJLD is committed to establishing a world-class Chinese liquor brand that fosters sustainable value in alignment with business ethics. The ZJLD Group Code of Business Conduct (hereinafter referred to as the “Code”) delineates the ethical principles and behavioural standards expected of ZJLD and its subsidiaries (collectively referred to as the “Group,” “Company,” or “we”) and its employees in all commercial activities. By adhering to this Code, the Group aims to maintain legal compliance, promote honesty and integrity, encourage fair competition, and uphold social responsibility, ultimately generating greater value for shareholders, consumers, employees, suppliers, and other stakeholders.

## **Article 2**

This Code applies across the entire Group, encompassing all members of the Group’s Board of Directors, senior executives, full-time employees, temporary employees, interns, and any third parties acting on behalf of the Group.

# **Chapter 2: Detailed Rules**

## **Article 3: Anti-Corruption and Anti-Bribery**

We are fully committed to complying with all applicable laws and regulations regarding anti-corruption and anti-bribery in the regions where we operate. We prohibit any form of bribery, kickbacks, embezzlement, or corruption, whether directly or through third parties.

For detailed rules, please refer to the ZJLD Group Anti-Corruption and Anti-Bribery Policy.

## **Article 4: Management of Conflicts of Interest**

We actively prevent conflicts of interest involving board members, senior executives, and employees. Should a conflict arise, it must be resolved in a manner that serves the Company’s interests and protects the interests of shareholders.

For further details, refer to the ZJLD Group Conflicts of Interest Management System.

## **Article 5: Antitrust/Anti-Competitive Practices**

We strictly adhere to all applicable laws concerning fair trade and competition. We refrain from any activities that restrict competition, including monopolistic agreements (cartels), price-fixing collusion with competitors, and abuse of market dominance.

For detailed rules, please refer to the ZJLD Group Antitrust Compliance Management System.

## **Article 6: Anti-Money Laundering and Insider Trading**

We comply with all laws regarding anti-money laundering and insider trading. The Company and its employees must not conceal illicit funds or engage in activities to legitimize them. We prohibit

payments to non-trading or abnormal commercial accounts and avoid transactions with parties suspected of money laundering. Employees must not disclose insider information or trade securities based on significant non-public information.

## **Article 7: Confidentiality of Information**

Employees must manage data assets responsibly to ensure their security. The unauthorized disclosure, transfer, or misuse of confidential information is strictly prohibited. Breaches of information security, including data loss or leakage, will impact annual performance evaluations and could lead to legal consequences if they violate national laws.

For detailed rules, please refer to the ZJLD Group Information Security Policy.

## **Article 8: Environmental Protection**

We are dedicated to protecting the ecological environment and addressing climate change risks throughout our operations and value chain. We implement strategies aligned with best practices to reduce pollution, lower carbon emissions, and conserve water, promoting eco-friendly brewing practices and a green, low-carbon value chain.

For detailed rules, please refer to the ZJLD Group Environmental Protection Policy.

## **Article 9: Occupational Health and Safety**

The Group complies with all relevant occupational health and safety laws, including Labor Law of the People's Republic of China, the Work Safety Law of the People's Republic of China, the Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, and the Fire Protection Law of the People's Republic of China. We are committed to enhancing labour protection, improving working conditions, and safeguarding the safety and mental health of employees. Comprehensive training in occupational health and safety is provided to raise awareness among employees.

For detailed rules, please refer to the ZJLD Group Occupational Health and Safety Policy.

## **Article 10: Anti-Discrimination**

We oppose and eliminate discrimination based on gender, sexual orientation, race, nationality, ethnicity, disability, marital status, pregnancy, religious belief, political affiliation, and cultural background in recruitment and employment practices, including promotions and training.

For detailed rules, please refer to the ZJLD Group Respect, Diversity, Equality, and Inclusion Policy.

# **Chapter 3: Business Ethics Training and Compliance Procedures**

## **Article 11**

The Group is committed to providing business ethics training for Directors, senior executives, full-time employees, temporary employees, interns, and third parties acting on the Group's behalf,

including training for all new hires.

## **Article 12**

Accountabilities and reporting lines are clearly defined across all divisions and subsidiaries. Compliance with this Code is linked to employee performance appraisals, compensation, promotions, and other related aspects.

## **Chapter 4: Complaints and Whistleblowing**

### **Article 13**

All employees are responsible for reporting any violations, including breaches of laws, regulations, this Code, and Group policies. Employees should promptly report any actual or potential violations upon discovery, ensuring their reports are impartial and honest.

### **Article 14**

The Group has established 24/7 independent reporting channels:

Whistleblowing Email: [pwx999@zjld.com](mailto:pwx999@zjld.com)

Whistleblowing Hotline: 18565227890, 010-56969066

Mailing and Visiting Address: 8th Floor, Jiahe Guoxin Building, Dongcheng District, Beijing

### **Article 15**

Upon receiving a report, the Group will promptly investigate the alleged violation. Depending on the severity, disciplinary actions—including warnings, demotions, or dismissals—may be enforced, with a zero-tolerance policy for illegal conduct.

### **Article 16**

Whistleblowers may report anonymously, and the Group will maintain the confidentiality of reported information. Disclosure of a whistleblower's identity or any report details to the accused is strictly prohibited. Any form of retaliation against whistleblowers is forbidden, and measures will be taken to protect them.

## **Chapter 5: Supplementary Provisions**

### **Article 17**

The ESG Management Department of the Group is responsible for interpreting this Code.

### **Article 18**

This Code is approved by the Group's Board of Directors and takes effect upon its release. This Code has approved by the Group's Board of Directors and takes effect upon its release.