

山东玲珑轮胎股份有限公司

反腐败反贿赂方针

Anti Corruption and Anti Bribery Policy of Shandong Linglong Tire Co., Ltd

山东玲珑轮胎股份有限公司（以下简称“玲珑轮胎”或“公司”）倡导廉洁文化，致力于打造诚信、阳光、健康的工作氛围和营商环境，禁止一切形式的腐败或贿赂行为，并承诺在玲珑轮胎全公司范围内推行反腐败反贿赂方针。玲珑轮胎的员工、承包商、供应商、客户或其他利益相关方（以下简称“相关方”）应当遵守公司相关制度及相关法律法规，并可以通过正规举报途径对腐败及贿赂行为进行举报，且举报人不因举报行为而遭到报复。

Shandong Linglong Tire Co., Ltd. (hereinafter referred to as "Linglong Tire" or "the Company") advocates a culture of integrity, is committed to creating an honest, sunny, and healthy working atmosphere and business environment, prohibits all forms of corruption or bribery, and promises to implement anti-corruption and anti bribery policies throughout the entire company of Linglong Tire. Employees, contractors, suppliers, customers or other stakeholders of Linglong Tire (hereinafter referred to as "stakeholders") shall comply with the company's relevant systems and laws and regulations, and may report corruption and bribery through formal reporting channels, and the informant shall not be retaliated against for the reported behavior.

1. 适用范围 Scope of Application

该方针适用于玲珑轮胎及其国内外所有分子公司、关联公司，以及聘用的任何人员或外部利益相关者。

This policy applies to Linglong Tire and all its domestic and foreign subsidiaries, affiliated companies, as well as any personnel or external stakeholders employed.

2. 适用法律、规定 Applicable laws and regulations

玲珑轮胎必须遵守所有适用的反贿赂法律法规，包括但不限于《中华人民共和国刑法》、《中华人民共和国反不正当竞争法》、《企业境外廉洁合规工作指引》，以及玲珑轮胎《合规承诺函》、《反围标串标通知书》、《干部员工廉洁自律承诺书》、《监督举报制度》等公司相关制度和廉洁自律保密建设的规定。

Linglong Tire must comply with all applicable anti bribery laws and regulations, including but not limited to the Criminal Law of the People's Republic of China, the Anti

Unfair Competition Law of the People's Republic of China, the Guidelines for Overseas Integrity and Compliance Work of Enterprises, as well as Linglong Tire's compliance commitment letter, anti collusion notice, commitment letter for integrity and self-discipline of cadres and employees, supervision and reporting system and other company related systems and regulations on integrity and self-discipline confidentiality construction.

3. 廉洁承诺 Integrity Commitment

玲珑轮胎禁止一切形式的腐败及贿赂行为,包括但不限于《合规承诺函》、《反围标串标通知书》、《干部员工廉洁自律承诺书》中所列举的行为,严禁通过捐赠手段不当影响政府官员/机构人员,或以任何形式换取不正当利益。但作为慈善活动的一部分,可直接向政府机构(而非个人官员)或其他机构进行捐赠。此类捐赠需事先获得政府/机构及公司的批准。玲珑轮胎严禁将促销或活动费用用于不当影响政府官员或机构人员,或以换取任何不正当利益。但在特定情况下,为推广、展示或说明公司产品及服务的,可适当向政府官员或机构提供此类资金支持。但需特别注意:在实施前,玲珑轮胎相关人员必须事先获得政府/机构及公司的书面批准。玲珑轮胎对外支付所有款项或提供的服务(包括但不限于佣金、报酬、礼品、宴请等)必须符合常规且合理,与所提供服务相匹配。未经玲珑轮胎书面批准,不得以现金形式支付;玲珑轮胎对一切腐败及贿赂行为采取零容忍态度。

Linglong Tire prohibits all forms of corruption and bribery, including but not limited to the behaviors listed in the Compliance Commitment Letter, Anti collusion Notice, and Integrity and Self discipline Commitment Letter for Cadres and Employees. It is strictly prohibited to influence government officials/institutional personnel through donations or to exchange any form of improper benefits. But as part of charitable activities, donations can be made directly to government agencies (rather than individual officials) or other organizations. Such donations require prior approval from the government/institutions and companies. Linglong Tire strictly prohibits using promotional or activity expenses to improperly influence government officials or institutional personnel, or in exchange for any improper benefits. However, in specific circumstances, such bonus support may be appropriately provided to government officials or institutions for the promotion, display, or explanation of the company's products and services. But special attention should be paid: before implementation, personnel related to Linglong Tire must obtain written approval from the government/agency and the company in advance. All payments or services

provided by Linglong Tire to external parties (including but not limited to commissions, remuneration, gifts, banquets, etc.) must comply with the usual and reasonable standards, and match the services provided. Without written approval from Linglong Tire, payment in cash is not allowed; Linglong Tire adopts a zero tolerance attitude towards all corrupt and bribery behaviors.

4. 举报机制及举报人保护 Reporting mechanism and whistleblower protection

根据玲珑轮胎《举报管理政策声明》，举报人可以通过公开的举报渠道进行投诉举报，玲珑轮胎针对每一份举报按照既定程序进行处理。玲珑轮胎高度重视举报人的举报内容，并承诺所有举报人的信息均受到严格保密，举报材料和记录均被列为机密文件，同时在核查举报情况时，始终不在暴露举报人信息的前提下进行。此外，公司坚决反对任何打击报复行为，一旦发现对举报人或参与调查合作的单位和个人进行打击报复的情况，将视情节轻重对当事人进行纪律处分、终止劳动合同，甚至移送司法机关处理。

According to the "Report Management Policy Statement" of Linglong Tire, whistleblowers can file complaints and reports through public reporting channels, and Linglong Tire will handle each report according to established procedures. Linglong Tire attaches great importance to the content of the whistleblower's report and promises that all whistleblower information will be strictly confidential. The reported materials and records will be classified as confidential documents. At the same time, when verifying the report, it will never disclose the whistleblower's information. In addition, the company firmly opposes any retaliatory actions. Once any retaliation is found against the informant or units or individuals involved in the investigation cooperation, disciplinary action, termination of labor contract, or even transfer to judicial authorities will be taken depending on the severity of the situation.

5. 违规处理 Violation Handling

一旦发现腐败、贿赂行为，玲珑轮胎将依据《举报管理政策声明》、《合规承诺函》、《反围标串标承诺书》等公司相关制度进行处理。

Once corruption or bribery is discovered, Linglong Tire will handle it in accordance with the company's relevant systems such as the "Report Management Policy Statement", "Compliance Commitment Letter", "Anti collusion Commitment Letter", etc.

6. 持续改进 Continuous improvement

玲珑轮胎将定期对反腐败反贿赂方针进行审查和修订,以确保其符合法律法规的要求和企业发展的需要。

Linglong Tire will regularly review and revise its anti-corruption and anti bribery policies to ensure compliance with legal requirements and the needs of enterprise development.