



## **Anti-Bribery and Anti-Corruption Policy**

### **1. Introduction**

CBC Tech is committed to conducting its business ethically, with integrity, and in compliance with all applicable laws and regulations. As part of this commitment, CBC Tech prohibits bribery, corruption, and any form of unethical behavior in all aspects of its operations.

### **2. Scope**

This Anti-Bribery and Anti-Corruption Policy applies to all CBC Tech employees, contractors, consultants, suppliers, vendors, agents, and other business partners who represent or act on behalf of CBC Tech in any capacity, regardless of location.

### **3. Definitions**

**Bribery:** The offering, giving, receiving, or soliciting of anything of value, directly or indirectly, to improperly influence the actions or decisions of individuals or organizations.

**Corruption:** The abuse of entrusted power for personal gain or advantage, including bribery, extortion, fraud, collusion, and other unethical conduct.

**Facilitation Payments:** Small payments or gifts made to expedite routine governmental actions, such as obtaining permits or licenses, that individuals or entities are legally entitled to.

**Public Official:** Any government official, employee, or representative, including elected officials, appointed officials, and employees of government agencies or state-owned enterprises.

#### **4. Prohibited Conduct**

CBC Tech prohibits the following conduct:

Offering, giving, receiving, or soliciting bribes or kickbacks, whether in cash, gifts, favors, or any other form, to improperly influence business decisions or gain an unfair advantage.

Engaging in corrupt practices, including extortion, fraud, collusion, embezzlement, money laundering, or other illegal or unethical conduct.

Making facilitation payments to expedite routine governmental actions, even if such payments are legal in certain jurisdictions.

Offering or accepting lavish gifts, entertainment, or hospitality that could reasonably be perceived as intended to improperly influence business decisions or gain an unfair advantage.

Engaging in conflicts of interest that could compromise impartiality or integrity in business dealings.

Failing to accurately record or report financial transactions or other business activities in accordance with applicable laws, regulations, and accounting standards.

#### **5. Compliance with Laws and Regulations**

CBC Tech employees and representatives must comply with all applicable anti-bribery and anti-corruption laws and regulations in China, and other relevant laws in each jurisdiction where CBC Tech operates.

#### **6. Due Diligence**

CBC Tech will conduct due diligence on its business partners, including suppliers, vendors, agents, consultants, and other third parties, to assess their integrity, reputation, and compliance with anti-bribery and anti-corruption laws and regulations.

#### **7. Reporting Violations**

Employees who become aware of any violations of this Anti-Bribery and Anti-Corruption Policy or any suspicious activities related to bribery or corruption are encouraged to report

their concerns through the appropriate channels, such as their supervisor, manager, the Ethics Committee, or the whistleblower hotline.

## **8. Non-Retaliation**

CBC Tech prohibits retaliation against individuals who report concerns in good faith or participate in investigations of suspected bribery or corruption. Any form of retaliation against whistleblowers will not be tolerated and may result in disciplinary action, up to and including termination of employment.

## **9. Training and Awareness**

CBC Tech will provide training and awareness programs to educate employees and representatives about the risks of bribery and corruption, their responsibilities under this Anti-Bribery and Anti-Corruption Policy, and the consequences of non-compliance.

## **10. Review and Revision**

This Anti-Bribery and Anti-Corruption Policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws, regulations, and industry standards. Any updates or revisions to the policy will be communicated to all employees and stakeholders.