

北京燕京啤酒股份有限公司

反贿赂与反贪污政策

Beijing Yanjing Brewery Co., Ltd.

Anti-Bribery and Anti-Corruption Policy

一、 目的

1. Purpose

北京燕京啤酒股份有限公司（下称“燕京啤酒”或“公司”）深刻理解诚信经营与守法合规的重要性，构建并持续完善商业道德相关制度体系，强化反贿赂反贪腐工作。本政策旨在规范燕京啤酒及商业伙伴在商业活动中应遵循的道德行为标准，加强合规管理，全力维护公平、诚信、透明的商业道德环境。

Beijing Yanjing Brewery Co., Ltd. (hereinafter referred to as “Yanjing Beer” or “the Company”) fully recognizes the significance of ethical business practices and legal compliance. The Company has established and continuously enhances a business ethics system while intensifying efforts in anti-bribery and anti-corruption. The policy sets out the ethical guidelines of conduct that Yanjing Beer and its business partners must follow in commercial activities, enhance compliance management, and actively promote a fair, honest, and transparent business ethics environment.

二、 适用范围

2. Scope

本政策适用于燕京啤酒及其下属公司所有董事、高级管理人员和全体员工（包括全职员工和兼职员工），并鼓励公司所有合作伙伴（包括但不限于供应商、承包商、经销商等）遵循本政策的行为标准。

The Anti-Bribery and Anti-Corruption Policy applies to all directors, senior management, and employees (including full-time and part-time employees) of Yanjing Beer and its subsidiaries, and encourages all business partners of the Company (including but not limited to suppliers, contractors, distributors, etc.) to adhere to the ethical guidelines of conduct of the policy.

三、 政策内容

3. Policy Content

（一）全体员工反贿赂与反贪污管理

1) Anti-bribery and Anti-corruption Management for All Employees

燕京啤酒严格遵守《中华人民共和国公司法》《中华人民共和国反不正当竞争法》《中华人民共和国反洗钱法》等国家法律法规及行业道德规范，对任何形式的腐败行为采取“零容忍”，所有董事、高级管理人员及全体员工应遵守国家法律法规及行业道德规范，严禁从事任何违法或不道德的经济行为并从中牟取利益。

Yanjing Beer conforms to the *Company Law of the People's Republic of China*, the *Anti-Unfair Competition Law of the People's Republic of China*, the *Anti-Money Laundering Law of the People's Republic of China* and other laws, regulations, and industry norms. The Company adopts a zero-tolerance approach to corruption in all forms. All directors, senior management, and employees are required to comply with national laws, regulations, and industry ethical standards. They are strictly prohibited from engaging in any illegal or unethical economic activities to obtain improper benefits.

燕京啤酒坚决禁止任何形式的贿赂行为，董事、高级管理人员和全体员工不得向公职人员或企业及个人提供、给予、承诺金钱或任何有价值物品，以谋取不正当利益。

Yanjing Beer strictly prohibits all forms of bribery. No director, senior management, or employee may give, offer, or promise money or anything else of value to public officials or corporate entities and individuals to obtain improper benefits.

燕京啤酒要求所有发生的费用必须准确记录，附带适当的证明文件，并在报销前及时录入公司记录，禁止任何秘密交易、杜绝未记录或未报告的交易行为。

Yanjing Beer requires that all expenses must be accurately accounted for, include appropriate supporting documentation and be promptly entered into company records before they are reimbursed. The Company prohibits any secret dealings and unrecorded or unreported transactions.

（二）合作伙伴反贿赂与反贪污管理

2) Anti-bribery and Anti-corruption Management for All Business Partners

燕京啤酒要求包括供应商、承包商、经销商在内的所有合作伙伴共同维护公平、透明、廉洁的商业环境。所有合作伙伴应严格遵守相关商业法律法规、规范和公司商业道德与诚信准则，严格杜绝任何形式的贪污、勒索和贿赂。

Yanjing Beer requires all business partners, including suppliers, contractors, and distributors, to jointly maintain a fair, transparent, and integrity business environment. All business partners must strictly adhere to relevant commercial laws, regulations, and norms, as well as the Company's business ethics and integrity standards, and strictly eliminate any forms of corruption, extortion, and bribery.

全体合作伙伴应制定符合自身情况的反贿赂与反贪污政策，并定期实施相应计划对政策执行情况进行检查，确保运营合规合法。

All business partners must formulate anti-bribery and anti-corruption policies tailored to their specific circumstances, regularly conduct corresponding plans and programs to monitor the enforcement of these policies, and verify lawful and compliant operations.

全体合作伙伴应在参与公司招投标前签订《阳光承诺书》《廉洁协议书》等文件，明确承诺不行贿、不受贿。

All business partners must sign the *Letter of Commitment for Honesty* and the *Integrity Agreement* before bidding and tendering, explicitly demonstrating a strict commitment to neither offering nor accepting bribes.

全体合作伙伴不得向公司及其他现有或潜在的业务伙伴承诺、提供、索要或接受可能会被视为影响交易公正性的赠予、付款、差旅招待或服务。

All business partners must not promise, offer, request or accept gifts, payments, travel hospitality, or services that may compromise the fairness of transactions with the Company or other existing or potential business partners.

(三) 举报与处理

3) Reporting and Handling

燕京啤酒明确投诉举报的权责划分与操作流程，确保相关事件及时有效处理，公司鼓励员工、合作伙伴及其他利益相关方监督和举报违规违纪违法行为，并公开举报热线、邮寄地址等渠道，保障相关问题得到及时反馈。

- 公司举报热线：400-010-0566
- 公司举报邮寄地址：北京市顺义区双河路 9 号燕京啤酒科技大厦纪检办公室

Yanjing Beer clarifies the division of authority and responsibility for complaints and reports and the operational process to ensure timely and effective handling of related events. We encourage employees, business partners and other stakeholders to supervise and report violations against regulations, rules and the law. We also make public the whistleblowing hotline, mailing address and other channels to ensure that timely feedback is given to whistleblowers.

- Whistleblowing hotline: 400-010-0566
- Whistleblowing mailing address: Disciplinary Inspection Office, Yanjing Beer Technology Building, 9 Shuanghe Road, Shunyi District, Beijing, China

(四) 举报人保护

4) Whistleblower Protection

燕京啤酒严格保护举报人及其权益不受侵害，要求参与举报处理的工作人员不得泄露举报人姓名、家庭住址、电话等个人信息，并接受匿名举报，相关投诉由专员专事专办，确保处理过程严格保密，最大程度保护举报人不遭受任何形式的报复行为。

Yanjing Beer strictly protects the interests and rights of whistleblowers from infringement, and persons handling the report should not disclose related information including names, addresses, and phone numbers. The Company accepts anonymous reports, and specialists handle complaints on a dedicated basis to guarantee confidentiality, ensuring whistleblowers are shielded from all forms of retaliation.

公司严禁任何非法歧视或报复行为，对于违规泄露检举人员信息或对举报人进行打击报复的人员，将追究相应的责任。

The Company prohibits any unlawful discrimination or retaliation. Those who disclose the reporting information or retaliate against the whistleblower will be held accountable accordingly.

(五) 审计与培训

5) Audit and Training

燕京啤酒建立完善的商业道德审计程序，按照国家法律法规以及公司相关制度，每三年对所有下属分子公司完成一次包括商业道德标准在内的审计，监督商业道德治理体系的有效性。

Yanjing Beer has established a robust business ethics audit procedure. The Company conducts business ethics audit and other audits on all subsidiaries every three years in accordance with national laws and regulations as well as the Company's policies, to supervise and ensure the effectiveness of the Company's business ethics governance system.

燕京啤酒应设立供应商评价小组，负责监督供应商对本政策及相关制度的执行情况；公司应每年对供应商评价小组开展监督核查，强化供应商廉洁管理。

Yanjing Beer should set up a supplier evaluation team to monitor suppliers' compliance with this policy and related regulations. The Company should conduct annual supervision and verification of the team to reinforce the management of suppliers' integrity.

公司应通过承诺书签订、会议宣讲、材料发放、案例分享等形式定期向全体员工（包括兼职员工）及合作伙伴开展本政策及相关制度的沟通、培训与宣传活动，持续提升商业道德和廉洁合规意识。

The Company should regularly communicate this policy and relevant regulations to all employees (including part-time employees) and business partners, and raise awareness of business ethics and integrity compliance through methods such as signing commitment letters, conducting meetings and presentations, distributing materials, and sharing case studies.

四、 生效与执行

4. Effective Date and Implementation

本政策自发布之日起生效。

The policy becomes effective on the date of issuance.

燕京啤酒邀请内外部相关方共同监督本政策的执行情况，若发现违反本政策的情形，可向燕京啤酒举报。公司对举报事项依规调查，严肃处理违规责任人，并采取补救措施消除负面影响。

Yanjing Beer invites all internal and external stakeholders to jointly monitor the implementation of this policy. If any violation is detected, it may be reported to Yanjing Beer. The Company will investigate such reports in accordance with regulations, take strict disciplinary actions against responsible individuals, and implement remedial measures to eliminate any resulting adverse effects.

五、 修订与审阅

5. Review and Revision

本政策将定期检讨及完善，以确保满足各利益相关方不断变化的期望及适应相关指引及标准的变动。

The policy will be periodically reviewed and enhanced to ensure that it continues to meet the evolving expectations of stakeholders and remains aligned with changes in relevant guidelines and standards.