

Ye Chiu Metal Smelting Sdn. Bhd.

Ye Chiu Non-Ferrous Metal (M) Sdn. Bhd.

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商业行为和行为准则管理办法
Business Ethics and Code of Conduct

制定部门 : 集团总管理处 YCMY 总经理室

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1. 总则

General Provision

- (1) 怡球集团所有经营活动应严格遵守相应的法律、法规及公司规定，对每位员工言，熟悉遵守怡球集团的行为准则至关重要，并以此来保证公司的商业行为符合最高的道德标准。

All business activities of Ye Chiu Group should strictly comply with the corresponding laws, regulations and company regulations. For each employee, familiar with and comply with Ye Chiu Group's code of conduct is essential, to ensure that the company's business behavior in line with the highest ethical standards.

- (2) 遵守公司依法制定的规章制度是怡球集团每位员工的责任，规范的商业运作对公司发展非常重要。每位员工有责任防止违法行为，若有不确定的作业行为时应寻求法务处的意见并在发现可能的违法行为时直言不讳。

Compliance with the rules and regulations formulated by the company is the responsibility of every employee of Ye Chiu Group, and the normative business operation is very important to the development of the company. It is the responsibility of each employee to prevent violations of the law. If there is uncertainty for any operation and behavior, the employee should seek advice from the Legal Management Section and speak up when possible violations are identified.

- (3) 怡球集团在兼并和收购，关闭、退役和撤资的过程中，会严格复审当中相关的环境、社会和治理问题。

Ye Chiu Group will strictly review the relevant environmental, social and governance issues during mergers and acquisitions, closures, decommissioning and divestments.

- (4) 怡球集团所有人员严格遵守本行为准则所载的标准，如有违反，将会受到纪律处分，严重者将被解雇。

Every employee in Ye Chiu Group will strictly comply with the standards contained in this code of conduct, any violation will subject to disciplinary action, and severe cases will be dismissed.

2. 企业文化

Company Culture

- (1) 愿景：做大循环经济产业，创造一流再生铝基地。

Vision: Expand the recycling business and create a first-class secondary aluminum facility.

(2) 使命：

Mission:

A. 追求卓越，勇于挑战；

Pursue excellence, rise to meet challenges;

B. 永续经营，向国际化发展。

Seek sustainable development and expand the business internationally.

(3) 价值观：忠诚、责任、高效、纪律、团队

Values: Loyalty, responsibility, efficiency, discipline, teamwork

(4) 品质和环境方针：

Quality and Environmental Policy:

怡球集团身为铝合金锭制造商，致力于满足客户和其他相关单位的需求，并遵守品质与环境管理系统之标准及相关法规，包括：

Ye Chiu Group as a secondary aluminum alloy ingot manufacturer, are committed to meet the expectations and needs of our customers and other interested parties by complying with quality & environment management system and applicable regulations requirements, including:

A. 持续改进；

Strives for continual improvement;

B. 保护环境及防止环境污染；

Protection of the environment, including prevention of pollution;

C. 落实自律管制措施（GSR）和环境主流化工具（EMT）；

Implements Guided Self-Regulation (GSR), including environmental mainstreaming tools (EMT), and;

D. 履行与集团有关的其他承诺；

Fulfill other specific commitment(s) relevant to the context of the organization;

E. 提供建立品质和环境目标的框架。

Provides the framework for establishing the quality and environmental objectives.

(5) 劳工和商业道德方针：

Labor and Business Ethics Policy:

A. 尊重人权，遵守法规；

Respect human rights and comply with laws and regulations;

B. 诚信经营，持续改进。

Operate with integrity, strive for continuous improvement.

(6) 尊重人权方针：

Respect Human Rights Policy:

A. 尊重人权；

Respect human rights;

B. 禁止强制劳动；

Prohibit forced labour;

C. 禁止童工；

Prohibit child labour;

D. 禁止骚扰和暴力；

Prohibit harassment and violence;

E. 尊重原住民的权利。

Respect rights of Indigenous Peoples.

(7) 职业健康安全方针：

Occupational Health and Safety Policy:

怡球集团致力于保护所有雇员和受其活动影响的人员的健康和安全。管理层和雇员须齐力达到以下方针目的。

Ye Chiu Group is committed to protecting the health and safety of all employees and the persons who may be affected by its activities. Both management and employees shall work together to achieve the below policy objectives:

A. 提供和维持安全与健康的工作条件，防止工伤和健康问题；

Provide and maintain a safe and healthy working condition for the prevention of work-related injury and ill-health;

B. 提供框架来建立职业健康安全的目标；

Provides the framework for establishing the occupational health and safety objectives;

C. 确保雇员和雇员代表参与职业安全健康管理体系决策过程，包括给予所有雇员充足的资讯指示、演练和监督；

Ensure consultation and participation of workers and workers' representatives in the decision-making process of occupational safety and health management system, including provides employees with the relevant information, instruction, training, and supervision;

D. 询察所有事故、疾病、中毒和危险事件并采取措施确保不重复发生；

Investigate all accidents, disease, poisoning, and dangerous occurrence and take measures to prevent reoccurrence;

E. 遵守适用的职业安全与健康法律法规和其他要求；

Comply with all applicable occupational safety and health laws and regulations and other requirements;

F. 提供雇员足够的福利设备；

Provide adequate welfare facilities for all employees;

G. 识别和消除安全隐患，降低职业健康安全风险；

Identify and eliminate safety hazards and reduce occupational health and safety risks;

H. 持续改进职业安全健康管理体系。

Strives for continual improvement of the occupational health and safety management system

(8) 知识产权方针：

Intellectual property policy:

鼓励创新，有效运用，科学管理，持续发展。

Encourage innovation, effective implementation, manage scientifically, sustainable development.

(9) 负责任采购方针：

Responsible sourcing policy:

A. 对铝的来源负责；

Take responsibility for the source of aluminum;

B. 反对一切形式的腐败；

Work against all forms of corruption;

C. 依照适用的当地或国际法律法规尊重人权；

Respect human rights in accordance with the applicable local or international law and regulations

D. 反对对冲突地区或高风险地区的武装冲突或侵犯人权行为提供支持；

Do not provide support for the armed conflict or human rights violations in conflict-affected or high-risk areas;

E. 建立各种程序，使利益相关方能够对铝供应链提出关切；

Establish procedures to enable stakeholders to raise concerns about the aluminum supply chain;

F. 提供健康与安全的工作环境；

Provide healthy and safe working environment;

G. 承诺保护环境，致力于减少对环境产生的负面影响。

Committed to protect environment, and reduce the negative impacts toward environment.

3. 信任与信誉

Trust and Reputation

怡球集团业务的成功取决于怡球集团从员工、客户和股东对其的信任和信心。怡球集团通过守信、诚实可信和廉正获得认可。

The success of Ye Chiu Group's business depends on the trust and confidence that Ye Chiu Group gained from the employees, customers and shareholders. Ye Chiu Group builds credibility by keeping promises, demonstrating honesty and integrity.

4. 尊重个人

Respect for Individual

(1) 员工都应该在一个有尊严和受尊重的环境中工作。怡球集团致力营造一个让员工感到尊重的环境，激发每个人的潜力，促进怡球集团业务的成功。

The employees are expected to work in an environment of dignity and respect. Ye Chiu Group is committed to creating such environment, because it can stimulate the potential of everyone, which directly contributes to the success of Ye Chiu Group's business.

(2) 怡球集团强调平等机会/平权行动，营造没有各种歧视，没有辱骂，诽谤或骚扰行为的工作场所。若员工感受到任何骚扰或歧视都可向上级或人力资源部门报告。

Ye Chiu Group emphasize equal opportunity/affirmative action and is committed to providing a workplace free from all kinds of discrimination and free from abusive, defamatory or harassing behaviour. Any employee who feels they have been harassed or discriminated may report it to their superior or Human Resources Department.

(3) 怡球集团尊重人权，遵守马来西亚相关的法律法规，与其规模大小和环境相符，包括最低限度的：尊重人权的方针承诺，人权尽职调查程序。当怡球集团落实方针和程序，确保尊重妇女的权利和利益，符合国家和地方政府的法律法规。

Ye Chiu Group respects human rights and complies with the relevant Malaysian laws and regulations, commensurate with its size and environment, including the minimum degree of: commitment to respect human rights policy, human rights due diligence procedures. When

Ye Chiu Group implementing policy and procedures, ensure respect for women's rights and interests as well as comply with the national and local government laws and regulations.

- (4) 怡球集团执行方针和程序，以确保尊重原住民的权利和利益，符合国家和地方政府的法律法规。在怡球集团的项目设计中应考虑可行的替代办法，以避免或尽量减少人群在实质性的地点和/或财产上的迁移，同时兼顾环境、社会和财政成本和效益，特别注意对穷人和弱势群体，包括妇女的影响。

Ye Chiu Group implements policy and procedures to ensure respect for the rights and interests of indigenous peoples as well as comply with national and local government laws and regulations. Feasible alternatives shall be considered in project design of Ye Chiu Group in order to avoid or minimize physical and/or economic displacement of people, while balancing the environmental, social and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable parties, including women.

- (5) 怡球集团尊重当地社区在其土地、生计及使用自然资源方面的法律和传统权益，并采取适当步骤，防止并解决由于其活动对当地社区生计造成的任何不利影响。

Ye Chiu Group respects the legal and traditional rights of local communities to their lands, livelihoods and use of natural resources, and takes appropriate steps to prevent and address any adverse impacts of its activities on the livelihoods of local communities.

- (6) 所有怡球集团员工也应遵守以下行为标准，以支持多元化和包容性工作场所：

All Ye Chiu Group's employees require to comply with the following code of conduct to support a diverse and inclusive workplace:

- A. 始终以有尊严和尊重的态度对待其同事、下属、怡球集团的商业伙伴及其他第三方；

Always treat the colleagues, subordinates, Ye Chiu Group's business partners and other third parties with dignity and respect;

- B. 处理并报告歧视性、骚扰性、辱骂性、诽谤等不当行为和评论；

Address and report discriminatory, harassing, abusive, defamatory, and other inappropriate behavior and comments;

- C. 避免可能无法跨文化翻译的俚语或习语；

Avoid slang or idioms that may not translate across cultures;

- D. 怡球集团依照国家、地方政府的法律法规，重视各方面的就业机会平等性，杜绝任何形式的歧视包括：暴力、性别暴力、性骚扰、体罚、精神或肉体胁迫、欺凌、公共羞辱或言语侮辱、以及基于种族、肤色、年龄、性别、性取向、国籍或社会

出身、种姓、残疾、家庭责任、怀孕、宗教、政治派别或在招聘过程中申请人的婚姻状况歧视，对员工聘用、薪酬、晋升、解聘、奖励和培训机会等的歧视或骚扰。怡球集团会根据员工自身的才能、能力、绩效、贡献和经验来招聘和选拔员工；

In accordance with the national and local governmental laws and regulations, Ye Chiu Group emphasize on equal employment opportunities in all aspects, and eliminate any form of discrimination including: violence, gender violence, sexual harassment, corporal punishment, mental or physical coercion, bullying, public humiliation or verbal insults, as well as eliminate discrimination or harassment on employee's recruitment, salary, promotion, dismissal, reward and training opportunities which against race, skin color, age, gender, sexual orientation, nationality or social origin, caste, disability, family responsibilities, pregnancy, religion, political affiliation or marital status of applicants during the recruitment process. Ye Chiu Group will recruit and select employees based on their own talents, abilities, performance, contribution and experience;

- E. 在就业、培训机会、合同授予、参与决策、薪酬和假期方面促进机会和待遇平等，以贯彻性别平等的观念；

Promote equality of opportunity and treatment in terms of employment, training opportunities, awarding of contracts, participation in decision-making, remuneration and leave to implement the concept of gender equality;

- F. 设定的工作时间、薪酬、福利和社会保障缴费都符合 1955 年马来西亚劳工法令，包括：最低工资、加班时间和法定福利；

Working hours, remuneration, benefits and social security contributions are set in compliance with the Malaysia Employment Act 1955, including: minimum wages, overtime hours and statutory benefits;

- G. 在怡球集团自身的影响范围内，怡球集团将支持和尊重马来西亚的可适用的法律法规，特别是杜绝强迫劳动如：拒绝支付工资、禁止员工请假、童工、人口贩运劳动、软禁、威胁、欺诈或强迫员工进行工作范围之外的事情等现象；

Within the Ye Chiu Group's own influence, Ye Chiu Group will support and respect the applicable Malaysian laws and regulations, especially to eliminate forced labor such as: refusal to pay wages, prohibiting employees from taking leave, child labor, human trafficking for labor, house arrest, threats, fraud or coercion of employees to do things outside the job scope;

- H. 怡球集团确保与工人及其代表就工作条件和解决工作场所及报酬问题进行公开沟通和直接接触，而不会受到报复、恐吓或骚扰等威胁；

Ye Chiu Group ensures open communication and direct engagement with workers and their representatives regarding working conditions and addressing workplace and remuneration issues without threats of reprisal, intimidation or harassment;

- I. 怡球集团依照国家、地方政府的法律法规，尊重当地法律规定的员工自由结社和集体谈判权利；

In accordance with the national and local governmental laws and regulations, Ye Chiu Group respects the rights of employees for freedom of association and collective bargaining;

- J. 在受冲突影响和高风险地区，怡球集团不助长武装冲突或侵犯人权。

In conflict-affected and high-risk areas, Ye Chiu Group does not contribute to armed conflict or human rights violations.

5. 竞争法与腐败行为

Competition Law and Corrupt Practices

怡球集团致力于遵守道德规范和公平的态度在市场上以产品和服务优势积极参与市场竞争。怡球集团将根据自身的优点、卓越的质量、功能和有竞争力的价格来销售怡球集团的产品。怡球集团将独立制定定价和营销决，不会与竞争对手进行不当合作或协调怡球集团的活动。怡球集团不会在为怡球集团购买商品或服务或销售其产品时提供或索要不当付款或酬金，也不会参与或协助对特定客户的非法抵制。员工必须避免与竞争对手有任何可能被视为贿赂、腐败的行为或活动。

Ye Chiu Group is committed to complying with code of ethics and a fair attitude to actively participate in market competition with product and service advantages in the market. Ye Chiu Group will sell the products based on Ye Chiu Group's advantages, superior quality, functionality and competitive prices. Ye Chiu Group will make the pricing and marketing decisions independently and will not improperly cooperate with competitors or coordinate Ye Chiu Group's activities. Ye Chiu Group will neither offer nor solicit improper payments or gratuities in purchasing goods or services or selling Ye Chiu Group's products, and will not join or facilitate illegal boycotts of specific customers. Employees must avoid any conduct or activity with competitors that could be perceived as bribery or corruption.

6. 利益冲突

Conflict of Interest

- (1) 所有员工，无论级别或身份，应避免个人直接或间接利益和公司利益相冲突。与怡球集团客户、供应商的正常交往中，在不违反法律、法规、且不损害任何第三方权益。

All employees, regardless of rank or status, should avoid conflicts between direct or indirect personal interests and company interests. In the normal communication with the customers and suppliers of Ye Chiu Group, it does not violate laws and regulations, and does not affect the rights and interests of any third party.

- (2) 严格禁止利用职务之便或其影响力收受怡球集团客户、供应商的贿赂、回扣等勾结行为，获取不当得利。

It is strictly forbidden to take advantage of one's position or influence to accept bribes, kickbacks and other collusion behaviors from Ye Chiu Group's customers and suppliers to obtain improper advantage.

- (3) 员工必须避免任何可能干扰或看似干扰员工执行工作时的客观决策能力的关系或活动。当员工面临代表怡球集团采取的商业行动与员工个人或家庭利益发生冲突的情况时，员工对怡球集团负有促进其合法利益的义务。员工绝不能利用怡球集团的财产或信息谋取个人利益，或通过员工在公司的职位发现的任何机会为自己谋取私利。

Employees must avoid any relationship or activity that may interfere, or seem to interfere, with an employee's ability to make objective decisions while performing their jobs. Employees have a duty to promote legitimate interests of Ye Chiu Group when the employees face a situation where the employee takes business actions on behalf of the Ye Chiu Group is conflicting with the employee's personal or family interests. Employees must never use property or information of Ye Chiu Group for personal interest, or for their own personal gain through any opportunity that an employee discovers through his or her position in the company.

- (4) 利益冲突可能发生在以下情况：

Conflicts of interest may arise in the following situations:

- A. 无论雇佣性质，员工在受雇于怡球集团期间，另外受雇（本人或亲人）于公司竞争对手或潜在竞争对手、供应商或承包商、或担任其顾问；

During the period of employment with the Ye Chiu Group, regardless of the nature of the employee's employment with Ye Chiu Group, the employee is additionally employed (by

himself or relative) by, or as a consultant to a competitor or potential competitor, supplier or contractor of the Ye Chiu Group;

B. 雇用或监督亲属或密切相关的人员;

Employ or supervise a relative or closely related person;

C. 担任外部商业公司或组织的董事会成员;

Serving as a board member of an external commercial company or organization;

D. 在怡球集团竞争对手、供应商或承包商中拥有重大权益;

Have a material interest in Ye Chiu Group's competitor, supplier or contractor;

E. 在任何交易中拥有个人利益、经济利益或潜在收益;

Have a personal interest, financial interest or potential gain in any transaction;

F. 将怡球集团业务委托给怡球集团员工或其家人拥有或控制的公司;

Delegating Ye Chiu Group's business to companies owned or controlled by Ye Chiu Group's employees or their families;

G. 接受来自客户/潜在客户、竞争对手或供应商的礼遇、折扣、优惠或服务, 除非所有员工都可以平等获得待遇。

Acceptance of courtesies, discounts, offer or services from customers/potential customers, competitors or suppliers, unless equal treatment is available to all employees.

(5) 有利益冲突问题的员工应寻求法务处的建议。在从事任何可能导致利益冲突的活动、交易或关系之前, 员工必须寻求其主管或人事部门的审查。

Employees with concerns on conflict of interest should seek advice from the the Legal Management Section. Employees must seek review from their superior or the Human Resources Department before engaging in any activity, transaction or relationship that may result in a conflict of interest.

7. 礼品、酬金与商务礼遇

Gifts, Gratuities and Business Courtesies

(1) 怡球集团致力于以产品的优势进行竞争。怡球集团应避免任何会让人产生这样一种印象的行为, 即怡球集团寻求、接受或给予外部实体的优惠待遇以换取个人商业礼遇。商业礼遇包括与怡球集团有业务往来或可能有业务往来的个人或公司的礼品、酬金、膳食、茶点、娱乐或其他利益。员工因难以谢绝而接受象征价值的礼品或邀请, 应及时告知总经理, 接受的馈赠物应于三个工作日内上交管理部门, 并按《Y50012 礼品管理办法》办理。

Ye Chiu Group is committed to competing in market with the advantages of products. Ye Chiu Group shall avoid any action that would create the impression that Ye Chiu Group seeks, accepts or gives preferential treatment to external entities in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from individuals or companies that have business cooperation or may have business cooperation with Ye Chiu Group. If an employee accepts a gift or invitation of symbolic value due to difficult to refuse, the employee should inform the general manager in time, and the accepted gift should be handed over to the Administrative Department within three working days and handled in accordance with *Y50012 Gift Management Procedure*.

- (2) 原则上，怡球集团不鼓励员工接受客户或合作伙伴的礼遇。怡球集团不会给予或接受构成或可能被合理视为构成违反怡球集团或客户的法律、法规或政策，或者会导致怡球集团声誉产生负面影响的不公平商业诱因的商业礼遇。除非符合下列所有条件，否则员工不得给予、馈赠、提供或接受礼品或商业礼遇：

In principle, Ye Chiu Group discourages employees from accepting courtesies from customers or business partners. Ye Chiu Group will not give or accept commercial courtesy that consider or may be reasonably considered as unfair commercial inducement that violates the laws, regulations or policies of Ye Chiu Group or its customers, or that will cause a negative impact on the reputation of Ye Chiu Group. Employees may not give, give, offer or accept a gift or business courtesy unless all of the following conditions are met:

A. 接受商务礼遇

Accept business courtesies

- a. 在员工受雇期间所受到的多数商务礼遇都是因为员工在怡球集团的职位而提供的。员工不应该觉得有任何权利接受和保持商务礼节。虽然员工可能不会利用在怡球集团的职位获取商业礼遇，员工也绝不能索取，但可以接受未经请求的商业礼遇，以促进与怡球集团维持或可能建立业务关系的公司成功的工作关系和良好信誉。

Most of the business courtesies that employees receive during employment are provided because of the position of employees in Ye Chiu Group. Employees should not think that they have any right to accept and maintain business courtesies. While the employees may not use their position in Ye Chiu Group to obtain business courtesies, employees must never seek the business courtesy, but may accept unsolicited business courtesies that can promote the successful business relationship

of Ye Chiu Group with companies to maintain or the companies that may establish business relationships as well as promote good reputation of Ye Chiu Group.

- b. 授予合同或可能影响业务分配的员工、制定导致业务安排的规范或参与合同谈判的员工必须特别小心，避免造成偏袒现象或可能对公司的利益产生不利影响的行为。谨慎的做法是，当员工参与选择或重新确认供应商时，或在会造成提供礼遇是获得怡球集团业务的方式的印象的情况下，拒绝供应商的礼遇。

Employees who award contract, or may influence business arrangement, formulate procedure for business arrangement, or participate in contract negotiations must pay special attention to avoid acts that may create bias or may adversely affect the interests of the company. It is prudent to decline courtesies from suppliers when the employee is involved in the selection or requalification of suppliers, or in situations where it would create the impression that offering courtesies is the way to get Ye Chiu Group's business.

B. 接受膳食、茶点与娱乐

Receive meals, refreshments and entertainment

员工可接受或提供膳食或娱乐费用的人分享的偶尔膳食、茶点、娱乐和类似的商务礼遇，但前提是：

Employees may accept occasional meal, refreshments, entertainment and similar business courtesies that shared with the person providing the meal or entertainment expense, provided that:

- a. 不过度奢侈；

Not excessively extravagant;

- b. 商务礼遇不频繁，也不反映频繁接受同一个人或实体的礼遇模式；

The business courtesies are infrequent and do not reflect a pattern of frequent receipt of courtesies from the same person or entity;

- c. 该商务礼遇不构成企图影响商业决策的表象，例如接受合同即将到期的供应商的礼遇或款待；

The business courtesy does not constitute the appearance of an attempt to influence a business decision, such as accepting a courtesy or entertainment from a supplier whose contract is about to expire;

- d. 接受商务礼遇的员工与主管或同事讨论或让公众所知时不会感到不舒服。

Employees who accept business courtesies will not feel uncomfortable when discussing it with superiors or colleagues or making it known by the public.

C. 接受礼品

Accept gift

- a. 除金钱外，员工可接受主动提供并符合商业道德惯例的礼品，包括：

Except money, employees may accept gifts that is unsolicited and comply with ethical business practice, including:

- I. 纪念特殊场合的鲜花、果篮和其他朴素的礼物；

Flowers, fruit baskets and other modest gifts to commemorate special occasions;

- II. 象征性的礼品，如日历、钢笔、马克杯、帽子和T恤(或其他新奇的、广告或促销物品)。

Token gifts such as calendars, pens, mugs, hats and t-shirts (or other novelty, advertising or promotional items).

- b. 一般而言，员工不得接受与怡球集团有业务往来或可能有业务往来的实体提供的任何金额补偿、酬金或金钱，除非得到主管的批准。员工如对接受与提供商务礼遇有疑问，应向其主管或人事部门咨询。

In general, employees shall not accept compensation, gratuities or money of any amount from entities which Ye Chiu Group conduct or may conduct business unless approve by their superior. Employees who have doubt on accepting and offering business courtesies, should consult their superior or Human Resources Department.

D. 赠送商务礼遇

Give business courtesy

任何提供商务礼遇的员工须确保其行为不能被理解为试图获得不公平的商业优势或以其他方式对怡球集团产生负面影响。员工不得使用个人资金或资源做公司资源无法完成的事情。商务礼遇的费用结算必须按照怡球集规定与核决权限执行。

Any employees who offers a business courtesy must ensure that his or her actions cannot be considered as an attempt to gain an unfair business advantage or otherwise negatively affect Ye Chiu Group. Employees shall not use personal funds or resources to do things that cannot be accomplished with company resources. The settlement of business courtesy expenses must be carried out in accordance with the Ye Chiu Group's regulation and Delegation Authorization.

- a. 除特殊政府顾客外，怡球集团可提供非金钱礼品（即公司标志服装或类似的促销品）。此外，管理层可批准其他礼遇，包括价值合理的膳食、茶点或娱乐，但前提是：

Ye Chiu Group may provide non-monetary gifts (i.e. company logo apparel or similar promotional items) to special government customers. In addition, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- I. 该做法不违反任何法律法规或公司规章制度；

This practice does not violate any laws and regulations or company rules and regulations;

- II. 该商务礼遇符合行业惯例，频率少，不奢侈。

This business courtesy complies with industry practice, less frequent and not extravagant.

8. 公司资源保护

Company Resource Protection

- (1) 怡球集团资源，包括时间、材料、设备和信息，仅供怡球集团业务使用。怡球集团相信员工及代表会以负责任的方式行事，并运用良好的判断力来节约公司资源。上级负责分配给其部门的资源，并有权解决有关资源正确使用的问题。

Ye Chiu Group's resources, including time, materials, equipment and information, are for Ye Chiu Group's business use only. Ye Chiu Group believes that employees and representatives will act in a responsible manner and use good judgment to conserve company resources. Superiors are responsible for the resources assigned to their departments and have the authority to resolve issues regarding the proper use of resources.

- (2) 一般而言，员工不会使用公司的设备，如电脑、复印机和传真机进行外部业务或支持任何宗教、政治或其他外部日常活动，除非公司要求支持非营利组织。员工不会在工作时间分发与工作无关的材料。

In general, the employees do not use company equipment such as computers, photocopiers and fax machines for outside business or to support any religious, political or other outside routine activities, unless the company asks to support a non-profit organization. The employees will not distribute non-work-related materials during working hours.

- (3) 为了保护怡球集团网络和员工的利益，怡球集团保留监控或审查员工怡球集团配发的电脑或电子设备、互联网或怡球集团内联网所包含的所有数据和信息的权利。怡球集团不会容忍使用公司资源来创建、访问、存储、打印、招揽或发送任何骚扰、威胁、辱骂、露骨色情或其他冒犯性或不当地材料。

In order to protect Ye Chiu Group's network and the interests of the employees, Ye Chiu Group reserves the right to monitor or review all data and information contained in computers or electronic devices issued by Ye Chiu Group to the employees, the Internet or Ye Chiu Group's intranet. Ye Chiu Group will not tolerate the use of company resources to create, access, store, print, solicit or send any harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate material.

- (4) 有关合理使用怡球集团资源的问题应直接向上级主管提出。

Doubt on the proper use of Ye Chiu Group's resources should be directed to superior.

9. 商业机密与专有信息保护

Protection of Trade Secrets and Proprietary Information

- (1) 怡球集团每一位员工均有义务遵守数据保护和信息安全方面的法定条例和公司内部规章，维护公司人员以及员工、客户和其他业务合作伙伴的个人数据，机密和专有信息，防止未经授权披露、更改或销毁。文件管理与数据披露管理依据《Y50002 文书管理办法》与《Y50010 数据披露作业准则》执行。

Every employee of Ye Chiu Group is obliged to strictly comply with the statutory regulations and internal company regulations on data protection and information security, maintain personal data, confidential and proprietary information of company personnel and employees, customers and other business partners to prevent unauthorized disclosure, alteration or destruction of data. Document management and data disclosure management are carried out in accordance with the *Y50002 Document Management Procedure* and *Y50010 Data Disclosure Management Procedure*.

- (2) 怡球集团致力于知识产权保护，员工不得获取或试图以不正当方式获取竞争对手的商业秘密或其他专利技术和机密信息。怡球集团不会在未经授权的情况下使用、复制、分发或更改软件或其他知识产权。

Ye Chiu Group is committed to the protection of intellectual property rights, employees are not allowed to obtain or attempt to improperly obtain competitors' trade secrets or other

patented technologies or confidential information. Ye Chiu Group will not use, copy, distribute or alter software or other intellectual property without authorization.

10. 资料与数据披露

Information and Data Disclosure

- (1) 怡球集团依据法规要求，公开披露公司治理方法以及对环境、社会和经济的实质影响；公开披露由于违反适用法律而遭受的重大罚款、判决、处罚及非经济制裁等方面的信息；依照法律或合同要求向政府付款。

Ye Chiu Group publicly discloses the corporate governance methods and its real impact on the environment, social and economy in accordance with legal requirements; publicly discloses information on major fines, judgments, penalties and non-economic sanctions suffered due to violations of applicable laws; payment to the government is made according to the law or contract requirements.

- (2) 确保财务报告和公开文件披露内容完整、公正、准确、及时、易懂。此义务适用于所有员工，包括所有财务主管，并负责编写此类报告，包括起草、审查、签署或证明其中所载信息。任何商业目标都不能成为歪曲事实或伪造记录的借口。

Ensure that the financial reports and disclosure of public document are complete, fair, accurate, timely and understandable. This obligation applies to all employees, including all Finance Department superiors, who are responsible for preparing such reports, including drafting, reviewing, signing or certifying the information contained therein. No commercial objective is an excuse for misrepresenting facts or falsifying records.

- (3) 另外，员工不得选择性地披露（无论是在一对一或小型讨论、会议、演示、提案或其他方式）有关怡球集团、其证券、业务运营、计划、财务状况、业绩或任何发展计划等重大非公开信息。如遇媒体询问，员工应在发表前咨询怡球集团相关部门以确保信息准确性。在向客户进行演示或建议时，员工应特别警惕，以确保演示不包含重大的非公开信息。

In addition, employees shall not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) significant non-public information related to Ye Chiu Group, its securities, business operation, planning, financial condition, sales performance or any development planning. In case of media inquiries, employees should consult with relevant departments of Ye Chiu Group to ensure the accuracy of the information before publication. When making presentations or

recommendations to customers, employees shall specially vigilant to ensure that the presentations do not contain significant non-public information.

- (4) 如果员工了解到任何文件或公共传播中的信息是不真实的或具有误导性的，或者后续的信息将影响未来类似的文件或公共传播，员工则应告知上级和人力资源部门。

If the employees realize that the information in any document or in public communication is untrue or misleading, or that subsequent information will affect future similar documents or public communications, the employees shall inform their superiors and Human Resources Department.

11. 准确业务账簿和记录

Accurate Business Books and Records

- (1) 作为怡球集团正常业务过程的一部分，怡球集团会遵守所有怡球集团政策和指南以及所有监管和法律要求创建、保留和处置公司记录。员工在雇佣关系结束后，仍然有义务对怡球集团敏感信息和专有信息进行保密。未经授权使用或发布此信息属非法行为，将会被追究法律责任。

As part of Ye Chiu Group's normal business operation process, Ye Chiu Group complies with all Ye Chiu Group's policies and guidelines as well as all regulatory and legal requirements to create, retain and dispose company records. Employees are still required to keep the sensitive and proprietary information of Ye Chiu Group be confidential after their employment relationship terminated. Unauthorized use or publication of this information is illegal and will lead to legal action.

- (2) 所有公司记录必须真实、准确和完整，公司数据必须根据怡球集团和其他适用的会计原则及时准确地记入在账簿。怡球集团不得以不当方式影响、操纵或误导任何未经授权的审计，也不得干涉任何受聘对怡球集团账簿、记录、流程或内部控制进行内部独立审计的审计师。

All company records must be true, accurate and complete, and the company data must be entered in the books of account in a timely and accurate manner in accordance with Ye Chiu Group and other applicable accounting principles. Ye Chiu Group shall not improperly influence, manipulate or mislead any unauthorized audit, and not interfere with any auditor engaged to conduct an internal independent audit of Ye Chiu Group's books of account, records, processes or internal controls.

12. 媒体咨询

Media Consultation

怡球集团是一家备受瞩目的公司，记者和其他媒体成员可能会不时接触员工。为了确保怡球集团用一个声音说话并提供有关公司的准确信息，员工应该将所有媒体询问引向集团董事长所指定的新闻发布审核小组。未经事先咨询，任何人不得发布新闻稿。

Ye Chiu Group is a high-profile company and the employees may be approached by journalists and other media from time to time. To ensure Ye Chiu Group speak unanimously and provide accurate information about the company, employees should direct all media inquiries to Group's Chairman appointed press release review team. Without prior consultation, press releases shall not be published by anyone.

13. 环境、健康与安全责任

Environmental, Health and Safety Responsibilities

- (1) 怡球集团支持应用预防性方案以应对环境、健康与安全问题，在怡球集团自身的影响和能力范围内，积极承担责任，制定相规章制度，实现工伤管理系统、提高安全危险的设备与措施，提倡开发和使用有益于环境的技术和产品，并致力于怡球集团在实际经营活动中对员工的健康与安全防护。

Ye Chiu Group supports the application of preventive programs to deal with environmental, health and safety issues. Within Ye Chiu Group's influence and capabilities, actively take the responsibilities, formulates relevant rules and regulations, implements work-related injury management systems, and improves equipment and facilities for safety hazards, advocates the development and use of technologies and products that are beneficial to the environment, and is committed to the health and safety protection of employees in the Ye Chiu Group's actual business activities.

- (2) 根据联合国气候变化框架公约(UNFCCC)所制定的最终目标，怡球集团从生命周期的角度致力于温室气体减排，以减轻其对全球气候的负面影响。

According to the ultimate goal set by the United Nations Framework Convention on Climate Change (UNFCCC), Ye Chiu Group is committed to reducing greenhouse gas emissions from the life cycle perspective, as to mitigate its negative impact on the global climate.

- (3) 怡球集团每年说明并公开披露重要温室气体排放和各种能源的使用情况；并制定有时限的减排目标，并实施可实现这些目标的计划。

Ye Chiu Group explains and publicly discloses the important greenhouse gas emissions and the use of various energy sources every year; and sets time-bound emission reduction targets as well as implements plans to achieve these targets.

- (4) 怡球集团将对人体健康和环境有不利影响的大气污染物排放和水污染物排放降到最低，并根据废物减缓层级管理废物。

Ye Chiu Group minimizes the air pollutant emissions and discharge of water pollutant that have adverse effects on human health and the environment, and manages waste according to the waste mitigation hierarchy.

- (5) 怡球集团负责任地抽取、利用和管理水，以支持对水资源的管理。

Ye Chiu Group withdraws, uses and manages water responsibly to support the stewardship of water resources.

- (6) 怡球集团根据减缓层级顺序，管理对生物多样性的影响，以保护生态系统、居住地和物种。

Ye Chiu Group manages its impact on biodiversity according to mitigation hierarchy to protect ecosystems, habitats and species.

- (7) 怡球集团为员工提供应当的工作场所健康与安全信息，并为员工提供培训，让员工可识别其面临的工作场所危害。相关的健康与安全信息张贴在员工能看到的显眼位置。怡球集团确保所有员工获得岗前培训并在工作后定期对员工进行培训。

Ye Chiu Group provides proper workplace health and safety information and provides training for employees to recognize the workplace hazards that they are exposed to. Relevant health and safety information is posted in a prominent location where employees can view it. Ye Chiu Group ensures that all employees receive pre-job training and regularly trains employees after work.

- (8) 怡球集团向所有员工和承包商提供安全、健康的工作条件。怡球集团职业健康与安全管理体系要文件化，该体系应符合适用的国内和国际标准。

Ye Chiu Group provides safe and healthy working conditions to all employees and contractors. Ye Chiu Group's occupational health and safety management system shall be documented, and the system complies with applicable domestic and international standards.

- (9) 怡球集团为员工们提供向管理层提出、讨论并参与解决职业健康与安全问题的机制。怡球集团使用滞后和领先指标评价其职业健康和安全绩效，并努力不断改进。

Ye Chiu Group provides mechanisms for employees to raise, discuss and participate in resolving occupational health and safety issues with management. Ye Chiu Group evaluates

its occupational health and safety performance using lagging and leading indicators, and strives for continuous improvement.

14. 铝的管理

Aluminum Management

- (1) 怡球集团致力于从生命周期的角度，推动资源的使用效率和铝的回收利用，这既体现在内部运营中也体现在铝的价值链中。怡球集团在本身的运营中，尽量减少铝工艺废料的产生，并设立废料得以 100%回收、循环利用或再次使用的目标。

Ye Chiu Group is committed to driving resource efficiency and aluminum recycling from a life cycle perspective, which present in both internal operations and aluminum value chain. Ye Chiu Group minimizes the generation of aluminum process scrap and sets a goal of 100% recovery, recycling or reuse in the operations.

- (2) 怡球集团与当地的、区域性的或全国性的回收再生循环系统紧密配合，支持准确衡量并努力提高含铝产品在相关市场的再生循环利用率。怡球集团通过铝渣和残渣处理，最大限度地回收铝。

Ye Chiu Group works closely with local, regional or national recycling systems to support accurate measurement and strive to increase the recycling rate of the aluminum-containing products in relevant markets. Ye Chiu Group maximizes the aluminum recovery through dross and residue processing.

15. 纪律处分

Disciplinary Action

- (1) 对于屡次或故意不遵守怡球集团行为准则的员工，怡球集团可能会采取纪律处分。纪律处分将视违规情况而定，后果包括：

Ye Chiu Group may take disciplinary action against employees who repeatedly or willfully fail to comply with the Code of Conduct. Disciplinary action taken depends on the violation, the consequences include:

- A. 降级；

Demotion;

- B. 惩戒；

Disciplinary action;

- C. 对严重违规行为者将被停职或解雇；

Suspended or dismissed for serious violations;

D. 减免一定或无限期的福利；

Waiver of certain or indefinite benefits;

E. 在腐败、盗窃、贪污或其他非法行为的情况下将采取法律行动。

Legal action will be taken in case of corruption, theft, embezzlement or other illegal acts.

16. 调查程序

Investigation Procedure

(1) 怡球集团坚守开放和诚信文化，鼓励员工提出问题及与其主管、人事部门或法务处沟通任何不道德或不正当行为，如有疑问，员工应先寻求他们的建议。

Ye Chiu Group adheres to a culture of openness and integrity, and encourages employees to ask questions and communicate any unethical or improper behavior with their superiors, Human Resources Department or Legal Management Section. If in doubt, the employees should seek their advice first.

(2) 怡球集团为保障本行为准则的顺利执行，设置了员工举报程序。对于任何真实的，且通过正规渠道和形式提交的关于违反本行为准则的举报，怡球集团管理层都会认真、保密地进行调查核实以避免员工担心受到报复。举报途径如下：

In order to ensure the smooth implementation of this code of conduct, Ye Chiu Group sets up the employee reporting procedures. For any real reports about violations of this code of conduct submitted through formal channels and format, Ye Chiu Group's management will conduct careful and confidential investigations and verifications to prevent fear of retaliation of employees. The reporting channels are as follows:

A. 廉政纪检组举报邮箱：ycjohnsonhuang@gmail.com

Anti-Corruption Compliance Management Section reporting email:
ycjohnsonhuang@gmail.com

B. 廉政纪检组举报电话：

Anti-Corruption Compliance Management Section reporting contact number:

YCTC: 008618262067767

YCMY: 60122793814

C. 口头举报，举报人可向部门主管、人事部门、总管理处总经理室、或经营管理委员会口头举报。（受理举报者，应立即形成书面文件并由举报者签名确认）。

Oral report, the informant may report to the HOD, Human Resources Department, General Administrative Office or management committee. (If the complaint is accepted, a written document shall be formed immediately and signed by the informant for confirmation).

D. 总经理信箱举报:

General Manager reporting email:

a. YCPG : KMLEW@YECHIU.COM.CN

b. YCTL A: DSSWA@YECHIU.COM.MY

- (3) 相关人员接到举报后，应立即向廉政纪检组组长汇报，由廉政纪检组组长指派专案调查组负责人及成员。专案组应立即开展调查取证，定期召开会议，讨论案件调查进度。待调查取证完毕后，需出具调查报告（格式范本见附件一），并向廉政纪检组组长汇报。

After receiving the report, the relevant personnel shall immediately report to the superior of the Anti-Corruption Compliance Management Section, and the superior will assign PIC and members of the investigation teams. The investigation team should immediately carry out investigation and evidence collection, and hold regular meetings to discuss the progress. After the investigation and evidence collection is completed, the investigation report (Attachment 1) shall be issued and reported to the superior of the Anti-Corruption Compliance Management Section.

- (4) 秘书组负责对举报人、调查小组提供的资料进行整理归档。

Secretary responsible for archive all the information provided by the informant and the investigation team.

- (5) 如经查证，举报情况属实，怡球集团将对举报人奖励。举报人若为公司内部员工，怡球集团将视情况给予奖励，举报人若为供应商、合作伙伴相关人员，怡球集团将其列为诚信合作伙伴，与其保持长久的合作关系。

If reported case was true after verification, Ye Chiu Group will reward the informant. If the informant is company's employee, the employee will be awarded according to the situation. If the informant is supplier, partner, related personnel, they will be classified as faithful partner, and maintain long-term cooperative relationship.

- (6) 举报人如果仍然心存顾虑，也可以匿名的方式将举报内容通过意见箱或发电子邮件的方式至总经理。怡球集团确保不会对举报人采取任何打击报复。

If the informant still has concerns, he or she can submit the content of the report anonymously through the suggestion box or email to General Manager. Ye Chiu Group ensures that no retaliation will be taken against the informants.

17. 实施与修订

Implementation and Revision

本办法经总管理处总经理核准后实施，修订时亦同。

This management procedure shall be implemented or revised upon the approval of General Administration Office General Manager.

Ye Chiu Group
Private & Confidential

附件一：调查报告

Attachment 1: Investigation Report

关于OOOOO 调查报告
OOOOO Investigation Report

专案负责人 :
Investigation PIC :
专案组成员 :
Investigation Team Members :
日期 :
Date :

Investigation Report

举报途径 Report Method				受理时间 Acceptance Time	
案由 Description					
投诉举报人 Informant	姓名 Name	部门/单位 Department/Unit	职务 Position	联系方式 Contact No:	
被调查人 基本情况 Basic Information of Person of Interest	姓名 Name	部门 Department/Unit	职务 Position	入职日期 Hire Date	
调查事实 Investigation Facts	(This section contains a large diagonal watermark: "Ye Chiu Group Private & Confidential")				
结论与建议 Conclusion and Suggestion	调查结论: Investigation Conclusion: 奖惩建议: Reward and Punishment Suggestion:				
附件清单 Attachment List					