江苏今世缘酒业股份有限公司
商业道德及反腐败政策
Jiangsu King's Luck Brewery Joint-Stock Co., Ltd.
Business Ethics and Anti-Corruption Policy

江苏今世缘酒业股份有限公司（以下简称“公司”）严格按照法律法规和道德标准开展生产经营活动，禁止出现任何对公司诚信和声誉产生不良影响的行为。为保障公司诚信廉洁氛围，防范和控制腐败风险，根据《中华人民共和国公司法》《企业内部控制基本规范》等法律法规、规范性文件及《江苏今世缘酒业股份有限公司章程》的有关规定，结合公司实际情况，特制定本政策。

Jiangsu King's Luck Brewery Joint-Stock Co., Ltd. (hereinafter referred to as the "Company") conducts its production and operations in strict accordance with laws, regulations, and ethical standards and prohibits any conduct that may adversely affect its integrity or reputation. This Policy is formulated in light of the Company's circumstances and in accordance with the Company Law of the People's Republic of China, the Basic Standard for Enterprise Internal Control, other applicable laws, regulations, and normative documents, and the Articles of Association of Jiangsu King's Luck Brewery Joint-Stock Co., Ltd., to foster a culture of integrity and probity and to prevent and control corruption risks.

一、适用范围

I. Scope of Application

本政策适用于公司及子公司的所有董事、监事、高级管理人员和全体员工，并积极推动公司商业合作伙伴（如供应商、经销商等）落实相关政策。我们鼓励和支持商业合作伙伴（如供应商、经销商等）坚持诚信合规原则，确立和遵循本政策的行为标准。

This Policy applies to all directors, supervisors, senior management personnel, and employees of the Company and its subsidiaries. The Company also actively encourages its business partners, including suppliers and distributors, to implement relevant requirements. It encourages and supports business partners in upholding integrity and compliance and adopting and following the standards of conduct set out in this Policy.

二、指导监督机构

II. Governance and Oversight

本政策由公司董事会审计委员会批准，并负责指导监督本政策的执行。公司审计监察部、市场督察部、纪委办公室负责日常执行本政策，对违反本政策行为进行调查、取证并发布处理结果。

This Policy is approved by the Audit Committee of the Board of Directors, which is responsible for guiding and overseeing its implementation. The Audit and Supervision Department, the Market Supervision Department, and the Discipline Inspection Office are responsible for day-to-day implementation and for investigating, collecting evidence on, and issuing disposition results for violations of this Policy.

三、内容和规定

III. Policy Provisions

公司员工应廉洁自律，在履职过程中不得利用职务便利索取、暗示要求或收受他人贿赂或获取其他财产利益或者非财产利益，包括但不限于以下内容：

Employees shall uphold integrity and self-discipline and shall not use their positions to solicit, imply a request for, or accept bribes or obtain other financial or non-financial benefits in performing their duties. Relevant requirements include, but are not limited to, the following:

（一）反商业贿赂和反腐败

(1) Anti-Bribery and Anti-Corruption

公司重视廉洁文化建设，对商业贿赂和腐败“零容忍”。公司强化商业伙伴反商业贿赂和反腐败风险管控，在业务交往中明确反商业贿赂和反腐败声明与要求，抵制商业贿赂。在业务合同签订过程中，要求合作伙伴签订《诚信廉洁协议》。同时，要求全部供应商制定反商业贿

赂政策。

The Company places importance on fostering a culture of integrity and has zero tolerance for commercial bribery and corruption. It strengthens the management of anti-bribery and anti-corruption risks involving business partners, communicates anti-bribery and anti-corruption statements and requirements in business dealings, and rejects commercial bribery. When entering into business contracts, the Company requires business partners to sign an Integrity Agreement. It also requires all suppliers to establish anti-bribery policies.

公司倡导廉洁自律，员工在业务往来中涉及礼品、款待及其他商业馈赠行为时，应遵循诚信原则，不得提供、索取或接受可能被视为不当利益输送、商业贿赂，或可能影响业务判断的礼品、款待、现金及现金等价物、服务、优惠、便利及其他有价物品或利益。若员工在行使管理职权、业务交往过程中，确因各种原因导致无法拒收礼品或相关馈赠的，应主动上交至纪委办公室并完成登记手续，由公司按规定处理，保障员工廉洁从业。

The Company promotes integrity and self-discipline. When gifts, hospitality, or other business courtesies arise in business dealings, employees shall act with integrity and shall not offer, solicit, or accept gifts, hospitality, cash or cash equivalents, services, discounts, favors, or any other item or benefit of value that may be regarded as an improper transfer of benefits or commercial bribery or that may influence business judgment. If, in exercising management authority or conducting business, an employee is unable to refuse a gift or related courtesy for any reason, the employee shall voluntarily surrender it to the Discipline Inspection Office and complete the required registration procedures. The Company will handle the item in accordance with its rules to support employee integrity.

（二）反舞弊与公平竞争

(2) Anti-Fraud and Fair Competition

公司禁止员工及其他利益相关方出现采用欺骗等违法违规的舞弊行为，损害公司利益。严格遵循公平竞争规则，不得为谋取不正当利益向他人行贿，禁止员工私自利用职权或影响力使特定合作方得到特殊待遇。

The Company prohibits employees and other stakeholders from engaging in fraud through deception or other unlawful or non-compliant conduct that harms the Company's interests. Fair competition rules shall be strictly observed. Bribing others to obtain improper benefits is prohibited, and employees shall not use their authority or influence without authorization to secure preferential treatment for specific business partners.

（三）反洗钱

(3) Anti-Money Laundering

公司禁止参与或协助任何第三方非法洗钱，公司员工也不得从事或协助他人从事非法洗钱活动。

The Company prohibits participation in or assistance with illegal money laundering by any third party. Employees shall not engage in or assist others in illegal money laundering activities.

（四）利益冲突

(4) Conflicts of Interest

公司要求员工在履职过程中保持客观公正，主动识别、回避并如实申报可能影响其公正履职的利益冲突情形。员工应积极维护公司整体利益，妥善平衡个人与公司之间的利益关系，避免因潜在的利益冲突影响商业决策的独立性与公正性。公司致力为员工提供必要的指引，制定《廉洁自律管理制度》等相关制度，保障员工廉洁从业，加强监督和员工自律，支持其妥善处理潜在利益冲突。

The Company requires employees to remain objective and impartial in performing their duties and to proactively identify, avoid, and accurately disclose conflicts of interest that may affect impartial performance. Employees shall safeguard the Company's overall interests, appropriately balance personal and Company interests, and prevent potential conflicts of interest from compromising the independence and fairness of business decisions. The Company provides necessary guidance and has established policies including the Integrity and Self-Discipline Management Policy to promote employee integrity, strengthen oversight and self-discipline, and support the appropriate management of potential conflicts of interest.

（五）信息保密

(5) Confidentiality of Information

公司高度重视商业信息的保密性。员工应妥善保管在工作中接触到的保密信息，未经授权不得泄露、使用或传播涉及公司商业秘密、客户信息及其他敏感信息的内容。公司致力于建立并完善信息保密管理机制，保障各相关方的合法权益，并将信息保密要求纳入员工日常行为规范。

The Company places great importance on the confidentiality of business information. Employees shall properly safeguard confidential information accessed through their work and shall not disclose, use, or distribute the Company's trade secrets, customer information, or other sensitive information without authorization. The Company is committed to establishing and improving its confidentiality management mechanisms, protecting the lawful rights and interests of relevant parties, and incorporating confidentiality requirements into standards for employees' day-to-day conduct.

（六）环境、健康与安全

(6) Environment, Health and Safety

公司致力于在生产经营活动中积极承担环境保护责任，推动节能减排和资源合理利用，减少对自然环境的不利影响。公司将员工及相关方的职业健康与安全置于重要位置，致力于提供安全、健康的工作环境，持续强化安全生产管理，保障全体员工的职业健康。公司鼓励员工积极遵守环境、健康与安全相关法律法规及公司内部管理要求，将可持续发展理念融入日常运营与决策之中。

The Company is committed to fulfilling its environmental protection responsibilities in production and operations, promoting energy conservation and emissions reduction and the responsible use of resources, and reducing adverse impacts on the natural environment. It places the occupational health and safety of employees and relevant parties in a position of high importance, seeks to provide a safe and healthy work environment, continuously strengthens work safety management, and protects the occupational health of all employees. The Company encourages employees to actively comply with environment, health and safety laws, regulations, and internal management requirements and to integrate sustainable development principles into day-to-day operations and decision-making.

四、教育和培训

IV. Education and Training

公司将对全体员工及经销商、供应商、承包商等利益相关方至少每年开展一次廉政教育和培训，内容包含反贿赂、反贪腐等商业道德相关的法律法规及违反商业道德案件警示教育等，培训方式包括但不限于线上、线下合规培训、材料宣贯等。

The Company will provide integrity education and training at least annually to all employees and stakeholders such as distributors, suppliers, and contractors. The training covers laws and regulations related to business ethics, including anti-bribery and anti-corruption, and case-based warnings concerning business ethics violations. Training methods include, but are not limited to, online and in-person compliance training and distribution and explanation of training materials.

五、捐款和赞助

V. Donations and Sponsorship

公司可能会提供慈善类的捐款和赞助，以促进社会和谐发展，这种捐款不能用来为公司获取不当利益。公司只会在符合当地法律及惯例下进行合法和合乎道德的慈善捐款。此外，公司不会直接或间接向政治党派、政治协会和政治候选人提供政治捐赠。

The Company may make charitable donations and provide sponsorship to promote harmonious social development. Such donations shall not be used to obtain improper benefits for the Company. The Company makes charitable donations only where they are lawful and ethical under local laws and practices. In addition, the Company does not make political contributions, directly or indirectly, to political parties, political associations, or political candidates.

六、举报政策及举报人保护

VI. Whistleblowing Policy and Whistleblower Protection

公司鼓励员工对违反商业道德的行为进行举报，举报人可以采用电话、手机短信、信件、电子邮件、当面口头举报等方式进行举报，所有举报线索公司将按照《举报及举报人保护政策》有关规定受理并处置，并依照有关办法保障举报人的权益，严格保护每个举报人及其相关信息。

The Company encourages employees to report conduct that violates business ethics. Whistleblowers may submit reports by telephone, text message, letter, email, or in person. The Company accepts and handles all reported concerns in accordance with the Whistleblowing and Whistleblower Protection Policy, safeguards whistleblowers' rights and interests under applicable procedures, and strictly protects each whistleblower and related information.

当发现违规行为时，有关部门将启动内部调查程序，对涉事员工进行审查并调查核实。对于经调查核实认定的违规行为，公司将视情节轻重，必要时采取相应的纠正措施或纪律处分，包括但不限于警告、降职、辞退等；对涉及刑事犯罪的案件将移交司法机关处理。相关处理结果将依照公司相关制度规定予以记录和跟进，以维护本政策的权威性与有效性。

When potential misconduct is identified, the relevant departments initiate an internal investigation to review the employees involved and verify the facts. For substantiated violations, the Company takes corrective action or disciplinary measures as necessary based on the severity of the conduct, including but not limited to warnings, demotion, or dismissal. Cases involving suspected criminal offenses are referred to judicial authorities. Disposition results are recorded and followed up in accordance with the Company's policies to preserve the authority and effectiveness of this Policy.

七、定期审计

VII. Regular Audits

公司结合实际需要，至少每三年一次对公司所有业务开展商业道德相关的审计工作。

Based on operational needs, the Company conducts business ethics audits covering all business activities at least once every three years.

八、修订与审阅

VIII. Revision and Review

公司每年审阅本政策，并在必要时进行修订。

The Company reviews this Policy annually and revises it when necessary.