



赛轮集团股份有限公司

Sailun Group Co., Ltd.

商业道德手册

Business Ethics Manual

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董事长致辞

Chairman's Address

各位同仁、合作伙伴及社会各界朋友们：

Dear Colleagues, Partners, and Friends from All Walks of Life:

作为赛轮集团股份有限公司（以下简称“赛轮轮胎”）的董事长，我谨代表全体管理层郑重承诺：“信任与尊重”不仅是企业文化的根基，更是我们在商业活动中坚守的最高准则。我们始终坚信，唯有以诚信为基石，以责任为导向，方能赢得客户、员工、股东及社会的长期信任，实现可持续发展。

As Chairman of Sailun Group Co., Ltd. (hereinafter “Sailun Tire”), I solemnly pledge on behalf of the entire management team that “Trust and Respect” is not only the foundation of our corporate culture but also the highest principle we uphold in all business activities. We firmly believe that only by building on integrity and acting with responsibility can we earn the long-term trust of customers, employees, shareholders, and society, thereby achieving sustainable development.

为践行这一核心价值观，赛轮轮胎特制定《商业道德手册》，明确全体员工及合作伙伴的行为边界与责任。以下是我们对社会的庄严承诺：

To put this core value into practice, Sailun Tire has formulated this Business Ethics Manual to define behavioral boundaries and responsibilities for all employees and partners. Below are our solemn commitments to society:

以信任为纽带，坚守诚信经营。

Operate with integrity, bound together by trust.

反对任何形式的腐败、贿赂或商业欺诈，确保所有交易透明、合法。

Oppose all forms of corruption, bribery or commercial fraud, and ensure that every transaction is transparent and lawful.

尊重知识产权，保护商业机密，杜绝不正当竞争行为。

Respect intellectual property, safeguard trade secrets and reject unfair competition practices.

对客户、投资者及利益相关方保持坦诚沟通，拒绝虚假宣传或误导性承诺。

Communicate candidly with customers, investors and other stakeholders, and avoid false advertising and do not make misleading commitments.

以尊重为核心，维护多元权益。

Uphold respect and protect diverse interests.

尊重员工的人格尊严与职业发展，营造公平、包容的工作环境。

Respect employees' dignity and career development, fostering a fair and inclusive workplace.

关注供应链伙伴的合法权益，推动可持续、负责任的商业合作。

Safeguard the legitimate rights of supply-chain partners and promote sustainable, responsible cooperation.

保护消费者隐私与数据安全，提供优质、可靠的产品与服务。

Protect consumer privacy and data security while delivering high-quality, reliable products and services.

以合规为底线，履行社会责任。

Take compliance as the bottom line and fulfill social responsibility

遵守全球法律法规，积极响应国际商业伦理标准。

Observe global laws and regulations and proactively align with international business-ethics standards.

倡导环保与资源节约，推动绿色发展理念融入业务全流程。

Advocate environmental protection and resource conservation, embedding green-development concepts throughout our operations.

鼓励员工参与公益事业，回馈社会，传递正向价值。

Encourage employees to engage in public-interest activities, give back to society and spread positive values.

“合规不是选择，而是必须；道德不是口号，而是行动。”

“Compliance is not optional but mandatory; ethics are not slogans but actions.”

本手册不仅是一份文件，更是我们对社会的一份契约。我们将通过定期培训、内部审计及举报机制，确保合规要求落地生根。任何违反道德与法律的行为，都将受到严肃处理。

This manual is not merely a document but a covenant with society. Through regular training, internal audits, and whistleblowing mechanisms, we will ensure compliance is deeply rooted. Any violation of ethical standards or laws will be rigorously addressed.

最后，我呼吁全体同仁与合作伙伴携手同行，以“信任与尊重”为指引，共同构建负责任的商业生态，为社会创造长期价值。让我们的每一次选择、每一份行动，都经得起道德与法律的检验，赢得他人的尊重与信任。

Finally, I call upon all colleagues and partners to join hands in building a responsible business ecosystem guided by “Trust and Respect.” Let every decision and action withstand ethical and legal scrutiny, earning the respect and trust of others.

第一部分 商业道德治理与组织

Part I Business Ethics Governance and Organization

董事会：作为赛轮轮胎商业道德事宜的最高监管层级，统领商业道德准则的监督管理方向，确保整体工作符合赛轮轮胎战略及道德规范要求。

Board of Directors: As the highest governing body for Sailun Tire's business ethics matters, the Board oversees the supervision and direction of the Business ethics matters, ensuring full alignment with Sailun Tire's strategic objectives and ethical compliance requirements.

战略与可持续发展委员会：依据董事会指引，对赛轮轮胎商业道德工作进行全面监督，提供专业意见与建议，保障监督管理工作公正有效。

Strategy and Sustainable Development Committee: In line with the guidance of the Board of Directors, the Committee provides comprehensive oversight of Sailun Tire's business ethics work, offers expert opinions to ensure fairness and effectiveness.

可持续发展领导工作组：负责赛轮轮胎商业道德总体工作监督把控，协调各方资源，确保商业道德工作有序推进。

Sustainable Development Leadership Task Force: Oversees overall business-ethics work, coordinates resources and ensures orderly progress.

可持续发展工作小组-合规工作组：负责制定赛轮轮胎商业道德具体目标及政策制度，统筹工作进展，拟定工作实施方案。

Sustainability Development Task Force-Compliance Working Group: Sets concrete goals, policies and procedures; coordinates progress and drafts implementation plans

法务风控部：负责赛轮轮胎商业道德合规相关手册、制度的拟定、修订及解释，商业道德合规日常工作的执行，识别、评估业务流程中的商业道德风险，制定并落实风险防控措施，推动专项制度的落地。

Legal Affairs and Risk Control Department: Drafts, revises and interprets ethics-compliance manuals and policies, executes day-to-day compliance; identifies and assesses ethical risks, develops and implements targeted risk mitigation measures, drives the effective implementation of specialized policies.

审计与内控部：独立开展商业道德审计工作，定期审查赛轮轮胎运营活动，识别潜在风险点，并在每三年内对本赛轮轮胎全部运营地开展审计工作，及时发现和向上汇报违反商业道德的行为，并向合规工作组同步相关信息。

Audit and Internal Control Department: Conducts independent ethics audits, regularly reviews operations of Sailun Tire, identifies potential risks, and conducts audits over all operating sites each three years; promptly reports violations and shares findings with the Compliance Working Group.

第二部分 正文

Part II Core Provisions

一、赛轮轮胎与员工

1. Sailun Tire and Employees

1.1 建立和谐的劳动关系

Building Harmonious Labor Relations

赛轮轮胎秉承以人为本的理念，严格遵守适用的涉及劳工和人权的国际公约以及业务所在国家（地区）相关法律，尊重和依法维护员工合法权益，关注员工安全健康，为员工搭建良好的成长平台，致力于促进员工全面发展，实现员工个人价值与企业价值共同提升。

Sailun Tire adheres to a people-oriented philosophy, strictly observing international conventions on labour and human rights and the laws of the jurisdictions where we operate. Sailun Tire respects and lawfully safeguard employees' rights, focus on their health and safety, and provide a platform for growth, striving for the joint enhancement of individual and corporate value.

1.1.1 禁止歧视

Prohibition of Discrimination

赛轮轮胎坚持平等雇佣的原则，建立公平、公正、公开的选人用人机制，面对不同国籍、种族、性别、地域、宗教信仰、文化背景、残疾与否的应聘者及员工，我们提供平等发展机会。赛轮轮胎承诺所有员工在招聘、劳动、薪资、培训、晋升、补偿等阶段享受同等待遇。

Sailun Tire upholds the principle of equal employment, operating a fair, just and open recruitment and

staffing system, provides equal opportunities for development to all candidates and employees, regardless of nationality, race, gender, geographic origin, religious belief, cultural background, or disability status. Sailun Tire is committed to ensuring non-discriminatory treatment for all employees across all stages of employment, including recruitment, employment, remuneration, training, promotion and compensation.

1.1.2 反对骚扰

Anti-Harassment

赛轮轮胎致力于营造安全、尊重的职场环境，杜绝任何骚扰行为。任何人不得实施威胁、暴力、欺凌以及其他类似行为，不得在言语或行为上侮辱和骚扰他人，不得传播谣言或其他诽谤性、骚扰性信息。

Sailun Tire aims to create a safe, respectful workplace and eliminate all harassment. Threats, violence, bullying or any other similar behaviour, insulting and harassing language or behaviours, and the spreading of rumours or defamatory/harassing information are strictly forbidden

1.1.3 禁止使用童工

Prohibition of Child Labor

赛轮轮胎高度重视儿童权益保护工作，严格遵守全球各业务属地关于用工最低年龄的法律法规。公司坚决禁止任何侵害儿童权益的行为，杜绝一切剥夺儿童成长权利、影响儿童教育及身心健康发展的相关活动，切实履行企业社会责任，守护未成年人合法权益。

Sailun Tire attaches great importance to the protection of children's rights and interests, and strictly complies with all applicable laws and regulations regarding the minimum age for employment in all countries and regions where we conduct business operations. Sailun Tire firmly prohibits any conduct that infringes upon children's rights and interests, and resolutely eliminates all activities that deprive children of their rights to development, affect their education, or impair their physical and mental health. Sailun Tire earnestly fulfill our corporate social responsibility and safeguards the legitimate rights and interests of minors.

1.1.4 禁止强迫劳动

Prohibition of Forced Labor

赛轮轮胎尊重劳动者自由选择工作的权利，禁止任何形式的强迫劳动、债务奴役或超时强制劳动。公司持续完善用工管理制度、规范用工全流程、严守合规用工准则，切实保障员工合法劳动权益，积极营造公平公正、合规有序、以人为本的良好用工环境。

Sailun Tire respects employees' freedom to choose employment and prohibits all forms of forced labour, debt bondage or excessive compulsory overtime. Sailun Tire continuously improves employment management system, standardizes the entire employment process, and strictly adheres to employment compliance standards, thereby effectively safeguarding employees' lawful labor rights and interests and actively fostering a sound employment environment that is fair, just, compliant, orderly, and people-oriented.

1.2 避免利益冲突

Avoiding Conflicts of Interest

赛轮轮胎员工对赛轮轮胎负有忠诚责任，避免任何可能导致个人利益与赛轮轮胎利益相冲突的行为，始终坚持维护赛轮轮胎的利益和声誉。

Sailun Tire employees owe a duty of loyalty to Sailun Tire and avoid any act that may create a conflict between personal and company interests and always safeguarding Sailun Tire's interests and reputation.

利益冲突是指员工履行工作职责所代表的公司利益与其个人或关联方的利益之间存在冲突或潜在冲突，可能影响员工对公司的忠诚义务，导致员工为追求个人利益而损害公司利益。

Conflict of interest refers to the existence of a conflict or potential conflict between the company's interests represented by an employee in fulfilling his or her job responsibilities and the interests of the employee himself or herself or an affiliated party. This may affect an employee's loyalty obligation to the company and lead to the employee damaging the company's interests in pursuit of personal interests.

1.2.1 防止内部利益冲突

Preventing Internal Conflicts

员工间如存在亲属关系或者影响业务决策客观判断的其他任何形式的关系均应及时向相关部门¹报

¹ 相关部门包括：所在业务部门、法务风控部、审计与内控部。

Relevant departments include: the respective business department, the Legal & Risk-Control Department, and the Audit & Internal Control Department.

告。同时在业务开展中严格采取回避措施，确保业务流程不受私人关系影响，让决策和行动都基于客观事实与赛轮轮胎利益。

If employees have kinship or any other relationship that may affect objective business decisions, they must promptly report it to the relevant departments. Employees must take strict conflict-of-interest avoidance measures in business operations to ensure processes are free from personal influence, with decisions based on facts and Sailun Tire's interests.

1.2.2 不得直接竞争或者协助竞争者

Do not compete with the Company or assist competitors

员工不能从事任何与公司竞争的活动，包括但不限于利用职务上的便利自营、合营或者为他人经营与公司存在竞争关系的业务，或为有竞争关系的企业提供帮助。如果员工希望从事兼职工作，需事先经过所在单位书面认可。

Employees shall not engage in any activities that compete with the Company, including but not limited to: Taking advantage of the position to operate one's own business, jointly operate business with others, or operate businesses that compete with the Company for others, or provide assistance to enterprises that compete with the Company. If an employee wishes to engage in part-time work, he/she shall obtain the written approval of his/her unit in advance.

对于现有或潜在利益冲突事项，应及时向部门负责人及公司相关部门报告或咨询，并应主动回避。如果员工无法根据具体情况判断是否涉及利益冲突，应及时向部门负责人及公司相关部门咨询，并按照公司要求处理。

For the existing or potential conflicts of interest, employees shall report or consult the department head and relevant departments of the Company in time, and take the initiative to avoid them. If an employee cannot judge whether a conflict of interest is involved according to the specific situation, he/she shall consult the department head and relevant departments of the Company in time and deal with it according to the requirements of the Company.

二、HSE 与产品质量

2. HSE and Product Quality

2.1 关注职业健康

Emphasizing Occupational Health

员工是公司最宝贵的财富，这是赛轮轮胎的人本理念。赛轮轮胎在重视员工身心健康的同时，更关注员工的职业健康。近年，赛轮轮胎对噪声、烟气、粉尘、有毒有害气体等开展持续治理，并取得了显著效果。未来，赛轮轮胎将继续加强职业卫生环境改善，提高设备设施自动化水平，不断寻求职业病防护设施的优化升级，为员工提供更好的工作环境。

Employees are the company's most valuable asset, which embodies Sailun Tire's people-oriented philosophy. Sailun Tire prioritizes not only their physical and mental well-being but also placing special emphasis on their occupational health. In recent years, Sailun Tire has made continuous efforts in managing workplace hazards including noise, fumes, dust, and toxic gases, achieving remarkable results. Moving forward, Sailun Tire will further strengthen improvements in occupational-hygiene environment, enhance the automation level of equipment and facilities, persistently optimize occupational disease prevention system, and ultimately create better working conditions for our employees.

2.2 确保安全生产

Ensuring Safe Production

赛轮轮胎秉承“安全和风险防范是开展所有工作的前提”的安全文化理念，实施基于风险的过程管理，全面强化风险管控，严格落实安全责任，隐患排查闭环管理，提升全员安全素养。同时赛轮轮胎充分将数字化、信息化技术与安全管理相融合，通过智能化主动防护技术手段来保障安全，运用信息化工具提升安全管理，实现全过程安全管控，达到“零伤害”目标。

Sailun Tire upholds the safety-culture philosophy that “safety and risk prevention are prerequisites for all operations,” implements risk-based process management, comprehensively strengthens risk control, rigorously enforces safety responsibilities, implements closed-loop management of hazard identification and rectification, and enhances overall safety awareness. Concurrently, Sailun Tire integrates digital and information technologies with safety management, employs intelligent proactive protection technologies to ensure security, leverages digital tools to elevate safety oversight, to achieve full-process safety control and “zero-injury” goal.

2.3 保护生态环境

Protection of the Ecological Environment

赛轮轮胎采用先进的清洁生产技术和工艺，提高能源和资源的利用效率，从源头上减少污染物的产生。赛轮轮胎将环境保护纳入长期发展战略，配套建设和运营污染治理设施，确保废气、废水、废渣等污染物达标排放，旨在实现生态环境保护与社会经济发展之间的和谐共生。

Sailun Tire employs advanced clean-production technologies and processes to improve energy and resource efficiency and reduce pollutants at the source. Integrating environmental protection into long-term strategy, Sailun Tire constructs and operates pollution-control facilities to ensure compliant emissions of exhaust, wastewater, and solid waste, to achieve harmonious coexistence between ecological protection and socioeconomic development.

2.4 提升产品与服务质量

Enhancing Product and Service Quality

赛轮轮胎坚持以客户为中心，持续致力于产品与服务迭代与优化，创造更高客户价值。倾心为顾客提供更有价值的产品和服务。精准洞察市场动态与客户需求，以创新驱动产品升级，健全服务体系，全方位保障客户权益，以优质经营实现企业长效可持续发展。

Sailun Tire remains customer-centric, continuously dedicating ourselves to the iteration and optimization of products and services to create greater customer value. It is wholeheartedly committed to providing customers with more valuable products and services. By accurately discerning market dynamics and customer needs, Sailun Tire drives product upgrades through innovation, strengthens the service system, comprehensively safeguards customer rights and interests, and achieves long-term, sustainable corporate development through operational excellence.

三、资产与财务管理

3. Asset and Financial Management

3.1 正确使用和保护赛轮轮胎资产

Proper Use and Protection of Sailun Tire Assets

赛轮轮胎员工应自觉维护公司资产权益，保障各类资产安全完整，杜绝一切损害赛轮轮胎资产的行为。严禁以任何形式挪用公司资产，如私自占有库存商品、擅自挪用资金用于个人投资等。全体员

工应树立资产保护意识，规范、合理使用各类资产，履行资产保管责任。Sailun Tire employees shall consciously safeguard the company's asset rights and interests, ensure the safety and integrity of all assets, and refrain from any acts detrimental to Sailun Tire's assets. It is strictly prohibited to misappropriate company assets in any form, such as unauthorized possession of inventory or diversion of funds for personal investment. All employees shall foster an awareness of asset protection, use all assets in a proper and reasonable manner, and fulfill their asset safekeeping responsibilities.

3.2 保护赛轮轮胎知识产权

Protection of Sailun Tire Intellectual Property

赛轮轮胎重视知识产权对公司竞争力与发展的关键作用，尊重并维护赛轮轮胎及第三方知识产权，对重点业务落实知识产权归口管理，常态化开展分层培训，课程涵盖产权基础、各岗位风险防控、海外出口合规及维权实操，筑牢全员知识产权防护意识，营造公平有序环境。赛轮轮胎员工应合理使用赛轮轮胎知识产权推动业务，合法接触第三方知识产权。严禁违规使用赛轮轮胎知识产权谋私利，侵犯第三方知识产权，不得私自占有职务发明成果，主动开展侵权监测维权，全方位筑牢知识产权防护体系。

Sailun Tire recognizes the critical role of intellectual property in the company's competitiveness and development. Sailun Tire respects and safeguards the intellectual property rights of both Sailun Tire and third parties, implements centralized intellectual property management for key business operations, and regularly conducts tiered training programs. The training curriculum covers IP fundamentals, position-specific risk prevention and control, overseas export compliance, and practical rights enforcement skills, thereby consolidating the IP protection awareness of all employees and fostering a fair and orderly environment. Employees of Sailun Tire shall use Sailun Tire's intellectual property in a reasonable manner to drive business and lawfully engage with third-party intellectual property. It is strictly prohibited to misuse Sailun Tire's intellectual property for personal gain, infringe upon third-party intellectual property rights, or privately appropriate service invention achievements. Employees shall proactively carry out infringement monitoring and rights enforcement and build a comprehensive intellectual property protection system in all respects.

3.3 严格执行财税制度

Strict Implementation of Fiscal and Tax Regulations

赛轮轮胎秉持诚信与合规的经营准则，严格遵守各项财税法律法规，确保财务报表客观、真实、完整反映公司经营与财务状况。坚决禁止通过篡改、虚构财务数据伪造报表，杜绝粉饰业绩等误导投资者和监管机构的行为，保证财务信息真实可信。

Sailun Tire upholds the business principles of integrity and compliance, strictly abide by all fiscal and tax laws and regulations, ensuring that financial statements objectively, truthfully and completely reflect the Company's operating results and financial position. Fabricating or altering data to falsify reports, or embellishing performance metrics is strictly prohibited; financial information must be truthful and reliable.

四、信息与数据保护

4. Information and Data Protection

4.1 严格保密信息的管理

Strict Confidential Information Management

赛轮轮胎视运营中积累的商业秘密为核心竞争力，实行“统一领导、归口管理、分级负责”的保密管理体制，以及“积极防范、突出重点、技管结合，确保保密信息安全且利于信息资源合理利用”的原则，全体员工应严格履行保密义务。员工可在内部依职责权限合规使用、存储保密信息，依规与第三方电子共享。严禁为谋取私利使用保密信息，未经批准擅自对外披露保密信息，以及违反相关保密管理规定处理保密信息。

Sailun Tire regards trade secrets accumulated during operations as core competitiveness and adapts the confidentiality-management system of “centralized leadership, categorized management, and hierarchical accountability,” as well as the principles of “proactive prevention, prioritized focus, technical-and-administrative combination, ensuring security of confidential information while enabling rational utilization of information resources.” All employees shall strictly comply with confidentiality obligations. Employees may use and store confidential information internally within their authority and share it electronically with third parties per regulations. It is forbidden to use confidential information for personal gain, disclose it without approval, or handle it in violation of confidentiality rules.

4.2 依法保护个人信息

Lawful Protection of Personal Information

赛轮轮胎始终将隐私保护和数据安全置于日常运营的核心位置，致力于以负责任的态度管理和保护客户、消费者、员工以及合作伙伴的可识别信息，为所有利益相关方提供一个安全可靠的数据环境。禁止非法收集、处理或滥用个人信息。加强员工的隐私和数据保护专题培训和教育，确保员工了解、遵守隐私和安全政策。

Sailun Tire consistently places privacy protection and data security at the core of daily operations, committed to responsibly managing and safeguarding identifiable information of customers, consumers, employees, and partners, providing a secure and reliable data environment for all stakeholders. The illegal collection, processing, or misuse of personal information is strictly prohibited. Employees shall receive enhanced themed training and education on privacy and data protection to ensure their understanding of and compliance with privacy and security policies.

4.3 加强网络安全管理

Strengthening Cybersecurity Management

赛轮轮胎以构建稳固的网络与信息安全体系为核心，保障赛轮轮胎网络安全，为业务开展提供坚实技术后盾。持续投入资源搭建完善安全体系，涵盖网络架构优化、数据加密、访问控制等。定期开展安全评估与漏洞检测，加强员工网络安全培训，提升全员安全意识，筑牢赛轮轮胎网络安全防线。

Sailun Tire focuses on establishing a robust network and information security system as the core, providing a solid technical foundation for business operations. Sailun Tire continuously invests resources to establish and improve security framework, including network architecture optimization, data encryption, access control, and more. Regular security assessments and vulnerability detection are conducted, while cybersecurity training for employees is strengthened to elevate organizational security awareness and fortify Sailun Tire's network security defenses.

4.4 禁止内幕交易

Prohibition of Insider Trading

赛轮轮胎严格遵循上市公司监管要求与相关法规，坚决杜绝内幕交易与密报²行为，全力维护资本市

² 密报行为：指员工将工作中知悉的集团内幕信息泄露给他人的行为。即便员工未从中获利，但只要使得他人有可能基于这些内幕信息进行投资决策，就属于违规的“密报行为”。"Confidential reporting violations": refer to employees leaking insider group information obtained through work to others. Even if employees do not profit from such actions, any act that enables others to potentially make investment decisions based on this insider information constitutes a prohibited "confidential reporting violation."

场的公正秩序，切实保护投资者利益，有效规避赛轮轮胎及相关人员面临的风险。严禁员工在信息披露前，利用内幕信息为自己或他人谋取利益，或泄露内幕信息诱导他人做出投资决策。员工可基于公开信息进行投资活动，也可在赛轮轮胎内部按照既定流程和权限，传递不涉及内幕的工作相关信息。

Sailun Tire strictly adheres to the regulatory requirements for listed companies and relevant laws, resolutely prohibits insider trading and confidential reporting violations³, fully upholds the fair order of capital markets, effectively protects investor interests, and mitigates risks faced by the company and personnel. Employees are strictly prohibited from using insider information for personal or others' benefit before public disclosures, or leaking insider information to influence others' investment decisions. Employees may conduct investment activities based on publicly available information and share work-related non-insider information internally within the company following established procedures and authorization.

4.5 依法对外披露信息

Lawful External Information Disclosure

赛轮轮胎始终坚守依法依规的行事准则，真实、准确、完整、及时地披露信息。在信息公开实践中，严格遵循相关法律法规与既定规则，对于公众聚焦关切的信息，秉持主动公开的态度，确保信息透明度。在内部管理上，扎实推进工作报告的精细编制与财会事务的规范处理，以严谨的流程把控和严格的数据审核，保障所涉数据如实反映实际情况，切实为对外信息披露筑牢根基、提供有力支撑。

Sailun Tire consistently upholds the principles of lawful and compliant operations, disclosing information truthfully, accurately, completely, and promptly. In information disclosure practices, Sailun Tire strictly follows relevant laws, regulations, and established rules, maintaining a proactive approach to transparency for information of significant public concern. Internally, Sailun Tire steadily advances refined preparation of work reports and standardized handling of financial and accounting matters. Through rigorous process control and strict data verification, ensuring that the involved data truthfully reflects actual conditions, thereby laying a solid foundation and providing strong support for external information disclosure.

五、商务活动与市场竞争

5. Business Activities and Market Competition

本手册所涉规则与期望，不仅适用于赛轮轮胎全球全体员工，我们也诚挚鼓励各地的客户、供应商及其他合作伙伴一同遵守本手册。事实上，在很多情况下，遵守本手册是与赛轮轮胎开展业务的一项必要条件。希望大家能向我们的客户、供应商及其他合作伙伴分享这些要求，并说明其重要性。共同遵循本手册，有助于营造公平、诚信、透明的商业环境，这对各方的长远利益以及我们合作关系的可持续发展，都至关重要。

The rules and expectations outlined in this manual apply not only to all Sailun Tire employees worldwide but are also sincerely encouraged to be followed by our customers, suppliers, and other partners across all regions. In fact, compliance with this manual is in many cases a necessary condition for conducting business with Sailun Tire. We urge everyone to share these requirements with our customers, suppliers, and other partners, emphasizing their importance. Joint adherence to this manual helps foster a fair, honest, and transparent business environment, which is critical to the long-term interests of all parties and the sustainable development of our collaborative relationships.

5.1 建立良好的合作伙伴关系

Establishment of Sound Partnership Relations

赛轮轮胎秉持诚信、公平、互利原则，致力于构建长期稳定且协同发展的合作关系，实现与合作伙伴的共同进步。以开放沟通搭建桥梁，定期与合作伙伴交流需求与想法；靠严格履行承诺赢得信赖，交付成果保质保量；凭借相互支持促进发展，面临困难时携手共进，实现资源共享、优势互补，为合作关系注入持久动力。

Sailun Tire adheres to the principles of integrity, fairness, and mutual benefit, committed to building long-term, stable, and collaboratively developed partnerships to achieve mutual progress with our partners. Sailun Tire bridges connections through open communication, regularly exchanging needs and ideas with partners; earns trust by strictly fulfilling commitments and delivering quality-assured, volume-committed results; and drives development through mutual support, joining hands to advance together when facing difficulties, realizes resource sharing and complementary strengths, injecting enduring momentum into collaborative relationships.

5.2 禁止不正当竞争

Prohibition of Unfair Competition

赛轮轮胎坚守合规经营，捍卫公平市场竞争。公司常态化开展反垄断、反不正当竞争全员合规培训，以案释法、明确红线，持续提升员工合规从业素养。赛轮轮胎致力于维护公平、公正、合法的市场竞争秩序，严格遵循相关规则，坚决抵制不正当竞争行为。全体员工严禁通过不正当手段获取对手商业秘密，严禁串通定价、划分市场、限制产能、围标串标等垄断及不正当竞争行为，杜绝各类破坏市场秩序的违规操作。公司对违规行为零容忍，以严格合规管理保障市场良性、有序发展。Sailun Tire adheres to compliant operation and upholds fair market competition. Sailun Tire delivers regular group-wide compliance training covering anti-monopoly and anti-unfair competition regulations, interpreting laws with actual cases to clarify compliance red lines and consistently improves employees' competency to conduct business in full compliance with laws. Sailun Tire is committed to maintaining a fair, impartial and legitimate market competition order. Sailun Tire strictly observes relevant regulatory rules and firmly resists all unfair competitive conduct. All employees are forbidden from acquiring competitors' trade secrets through improper means. Monopolistic and unfair competitive practices including price collusion, market division, production capacity restriction, bid rigging and collusive tendering are strictly prohibited, and all irregular operations undermining market order shall be eliminated. Sailun Tire implements a zero-tolerance policy for any violations of laws and regulations. Rigorous compliance management is adopted to safeguard healthy and orderly market development.

5.3 禁止商业贿赂行为

Prohibition of Commercial Bribery

赛轮轮胎坚决抵制一切商业贿赂行为，严格遵守境内外反腐败、反商业贿赂相关法律法规，坚守廉洁经营准则，维护透明、公平、公正的市场交易秩序。公司常态化开展全员反商业贿赂合规培训，重点针对商务、采购、销售岗位开展案例警示教育，清晰划清廉洁红线，持续提升员工风险防范能力。赛轮轮胎建立了健全的规章制度，明确规范礼品与接待标准，允许出于商业礼仪和惯例，在规定的范围内接受或提供小额、具象征纪念意义且非经常性的礼品，以及适度的接待；杜绝以不正当手段谋取商业利益，严格禁止为获取商业机会和利益向他人给予好处，禁止任何员工在商业活动中收受、索取他人的好处。

Sailun Tire firmly opposes all forms of commercial bribery, strictly complies with anti-corruption and anti-commercial bribery laws and regulations both domestically and overseas, abides by sound business integrity principles, and preserves a transparent, fair and impartial market transaction order. Sailun Tire

delivers regular company-wide compliance training on anti-commercial bribery, with targeted case-based warning education for staff in commercial, procurement and sales roles to clearly define integrity red lines and continuously strengthen employees' risk prevention capabilities. Sailun Tire has established a comprehensive set of rules and regulations that clearly standardize gift and hospitality policies. Subject to business etiquette and common commercial practices, employees may only offer or accept modest, symbolic, occasional gifts and reasonable hospitality within prescribed limits. All attempts to secure commercial gains through improper means are prohibited. Sailun Tire strictly bans offering improper benefits to others in exchange for business opportunities or profits, and forbids any employee from soliciting or accepting undue advantages from third parties during commercial activities.

5.4 遵守反垄断法规

Compliance with Antitrust Laws

赛轮轮胎遵守反垄断法规，保护市场公平竞争，保护客户、赛轮轮胎和社会公共利益。任何违反反垄断法的行为都可能对赛轮轮胎、管理层和相关个人造成巨额罚款甚至监禁。赛轮轮胎承诺公平竞争，杜绝违法行为。不与竞争对手签违法协议、交换敏感信息，不借行业协会违规接触。

Sailun Tire complies with antitrust laws, protects fair market competition, and safeguards the interests of clients, the company, and public welfare. Any violation of antitrust laws may subject Sailun Tire, management, and related individuals to substantial fines or even imprisonment. Sailun Tire is committed to fair competition and resolutely prohibits illegal practices. Sailun Tire refrains from entering into illegal agreements with competitors, exchanging sensitive information, or engaging in improper contacts through industry associations.

5.5 遵守反洗钱法律法规

Compliance with Anti-Money-Laundering Laws

赛轮轮胎遵循国内外反洗钱法律法规，坚决抵制洗钱活动，积极防范打击洗钱行为，维护金融秩序与自身合规运营。坚持合规交易，强化客户尽职调查，加强可疑交易监测，规范大额交易及时报告流程，确保交易对手及资金往来合法合规。

Sailun Tire complies with domestic and international anti-money laundering laws and regulations, resolutely resists money laundering activities, actively prevents and combats such practices, safeguards

financial order, and ensures own compliant operations. Sailun Tire maintains compliant transactions, strengthens customer due diligence, enhances monitoring of suspicious transactions, standardizes timely reporting procedures for large-value transactions, and ensures the legality and compliance of counterparties and fund transactions.

5.6 防范制裁与出口管制风险

Preventing Sanctions and Export-Control Risks

赛轮轮胎全球化经营严格遵守各国进出口及制裁法律，维护国家与企业合法权益。公司配套完善全球合规管理制度并嵌入全业务流程，常态化开展分层分类出口管制、反制裁合规培训，强化涉外员工风险防控能力。所有跨境新项目须前置合规排查，外贸合同统一增加管约束条款。全员严禁无证交易、违规输出受控技术、协助第三方规避管制等违规操作，严守跨境贸易合规红线。

Sailun Tire strictly complies with import, export and sanctions laws of all relevant countries to safeguard the legitimate rights and interests of the country and the enterprise. Sailun Tire has developed a comprehensive global compliance management system integrated into all business processes. Sailun Tire regularly delivers tiered and categorized compliance training covering export controls and anti-sanctions compliance to strengthen cross-border staff's risk prevention and control capabilities. All new cross-border projects are subject to pre-emptive compliance screening, and standardized control restrictive clauses are incorporated into all foreign trade contracts. All employees are prohibited from engaging in unlicensed transactions, unauthorized transfer of controlled technologies, assisting third parties in evading regulatory controls and other irregular practices, and shall strictly abide by the compliance red lines governing cross-border trade.

六、政府与社区

6. Government and Community

6.1 加强与政府沟通

Strengthening Government Communication

赛轮轮胎注重与政府沟通，致力于发展建设性关系。在严格遵循法律法规要求上，通过合法合规途径表达发展诉求，积极争取当地政策支持与资源协同，在实现企业高质量发展的同时助力区域经济社会建设。

Sailun Tire places importance on government communication and is committed to developing constructive relationships. While strictly adhering to legal and regulatory requirements, Sailun Tire expresses development needs through lawful and compliant channels, actively seeks local policy support and resource collaboration, thereby achieving high-quality corporate development while contributing to regional economic and social development.

6.2 禁止腐败行为

Prohibition of Corruption

赛轮轮胎严格遵守业务所在国（地区）及国际上的反腐败法律法规，对贿赂、洗钱、滥用职权等腐败行为采取“零容忍”态度，通过制度约束与文化培训防范腐败风险。赛轮轮胎员工发现腐败行为时，须立即制止不当行为、及时主动上报，并全力配合相关调查工作，不得隐匿线索、销毁证据或包庇相关人员。任何腐败及违规行为一旦查实，涉事方将被依法追责并终止合作。

Sailun Tire strictly adheres to anti-corruption laws and regulations in all operating countries (regions) and international standards, maintaining a "zero-tolerance" stance toward corruption such as bribery, money laundering, and abuse of power. Sailun Tire implements institutional controls and cultural training to mitigate corruption risks. Upon discovering any corrupt conduct, employees of Sailun Tire shall immediately stop the improper act, voluntarily report the matter without delay, and fully cooperate with relevant investigations. Employees are prohibited from concealing clues, destroying evidence or shielding involved personnel. Any confirmed corruption or non-compliant behavior will result in legal accountability for involved parties and immediate termination of cooperation.

6.3 支持社区公益事业

Supporting Community Public-Welfare Initiatives

赛轮轮胎在社区回馈中持续展现社会责任，积极支持社区公益事业，与当地社区共同进步、共同发展。在开展经营活动中，应避免侵犯当地社区和公众利益，遇到矛盾和问题，要和各方充分沟通协商，依法合规妥善解决。

Sailun Tire continuously demonstrates social responsibility through community engagement, actively supporting community public welfare initiatives and advancing alongside local communities for mutual progress and development. In conducting business operations, Sailun Tire should avoid infringing upon the

interests of local communities and the public. When conflicts or issues arise, Sailun Tire engages in thorough communication and consultation with all stakeholders to resolve them properly in accordance with laws and regulations.

6.4 慈善与政治捐赠

Charitable and Political Donations

赛轮轮胎严格遵循业务所在国（地区）及国际上的法律法规进行慈善捐赠活动，建立专项管理机制确保捐赠活动的透明性和可追溯性。在全球范围内不进行任何形式的政治捐赠，始终将资源聚焦于公益领域，以合规实践践行赛轮轮胎社会责任，维护公平市场秩序。

Sailun Tire strictly adheres to laws and regulations of the countries (regions) where we operate and international standards in conducting charitable donation activities, establishing dedicated management mechanisms to ensure transparency and traceability of our contributions. Sailun Tire refrains from making political donations of any form globally, consistently focusing our resources on public welfare initiatives. Through compliant practices, Sailun Tire fulfills our social responsibilities and upholds a fair market order.

6.5 尊重当地习俗习惯与宗教信仰

Respecting Local Customs and Religious Beliefs

赛轮轮胎尊重各个国家和地区的文化传统，要求全体员工在业务开展中全面理解并严格遵守当地文化传统，涵盖生活习俗、社交礼仪、宗教禁忌等多维度文化要素。努力在尊重文化差异的基础上，通过文化敏感性实践促进业务本地化发展，最终实现企业与当地社会的文化共生与价值共创。

Sailun Tire respects the cultural traditions of all countries and regions where we operate, requiring all employees to comprehensively understand and strictly adhere to local cultural traditions in business activities, encompassing multidimensional cultural elements such as living customs, social etiquette, and religious taboos. Sailun Tire strives to advance localized business development through culturally sensitive practices grounded in respect for cultural differences, ultimately achieving cultural symbiosis and collaborative value creation between the enterprise and local societies.

第三部分 关于本手册

Part III About This Manual

一、适用范围

1.Scope of Application

本手册适用于赛轮轮胎的所有员工、董事会成员、顾问，以及其他代表（代理）赛轮轮胎或以赛轮轮胎名义从事各项工作的人员。

This manual applies to all Sailun Tire employees, board members, consultants, and other representatives (agents) of Sailun Tire, as well as individuals performing work on behalf of or in the name of Sailun Tire.

赛轮轮胎鼓励商业合作伙伴、第三方合作伙伴等（包括但不限于供应商、专业顾问、承包商）均保持诚信合规，并促使其行为与本手册的相关规定保持一致。

Sailun Tire encourages business partners and third-party partners (including but not limited to suppliers, professional consultants, and contractors) to uphold integrity and compliance, and promotes alignment of their conduct with the relevant provisions of this manual.

二、咨询与举报

2.Consultation and Reporting

2.1 多样化反馈渠道

Diversified Feedback Channels

赛轮轮胎设立公开合规咨询渠道，以便员工就合规问题获得指导、反馈和建议。咨询内容将根据员工的要求，予以保密。

Sailun Tire has established open compliance consultation channels to enable employees to obtain guidance, feedback, and suggestions regarding compliance issues. Consultation content will be kept confidential as requested by employees.

咨询部门：赛轮集团股份有限公司 法务风控部

Consultation Department: Legal and Risk Control Department, Sailun Group Co., Ltd.

咨询电话：0532-68662196

Consultation Tel.: +86 532-6866 2196

咨询邮箱: compliance@sailuntire.com

Consultation Email: compliance@sailuntire.com

赛轮轮胎鼓励、支持对违反或疑似违反本手册的行为进行举报。举报可通过赛轮轮胎内网链接或以下方方式实名或匿名进行，实名举报必复。

Sailun Tire encourages and supports the reporting of violations or suspected violations of this manual. Reports can be submitted either anonymously or under real name through Sailun Tire's internal network link or the following channels. Real-name reports will receive mandatory responses.

<https://smartforms.Sailuntire.com/AutditReporting/Autdit/AuditReportingPage.aspx>

举报电话: 17568911565

Reporting Tel.: +86 175 6891 1565

举报邮箱: jubaotousu@sailuntire.com

Reporting Email: jubaotousu@sailuntire.com

2.2 受理流程

Acceptance Procedures

赛轮轮胎设专人受理合规咨询与举报。完成登记及初步甄别后，一般问题 5 个工作日内答复，复杂问题 15 个工作日内反馈，所有事项均按规范流程调查核实后处置。

Sailun Tire assigns dedicated staff to receive compliance inquiries and reports. Upon completion of registration and preliminary screening, responses to general matters shall be provided within 5 working days, while feedback on complex matters shall be delivered within 15 working days. All cases shall be investigated, verified and disposed of in strict accordance with standardized procedures.

2.3 举报人保护

Whistleblower Protection

赛轮轮胎将严格保护举报人隐私信息，严禁泄露举报内容以及举报人姓名、住址、电话等个人信息，严禁将举报材料转给被举报人或者被举报单位，禁止对举报人的打击报复，对阻止举报的行为进行严格处理，切实保障举报人合法权益。

Sailun Tire will strictly protect whistleblowers' privacy information. Sailun Tire strictly prohibits disclosing report content or personal information such as the whistleblowers' name, address, phone number, and forbids transferring report materials to reported individuals or entities. Retaliation against whistleblowers is prohibited, and any obstruction of reporting activities will be strictly addressed. These measures aim to safeguard whistleblowers' lawful rights and interests.

三、修订与解释

Revision and Interpretation

赛轮轮胎将根据法律法规及监管要求的变化，及时对本手册进行修订。赛轮轮胎法务风控部负责本手册内容的修订与解释。

Sailun Tire will timely revise this manual in accordance with changes in laws, regulations, and supervisory requirements. The Legal and Risk Control Department is responsible for the revision and interpretation of the content of this manual.