

ZTT Compliance Rules on Gifts and Hospitality

CHAPTER I. GENERAL PROVISIONS

Article 1. In order to further standardize the management of gifts and hospitality, Jiangsu Zhongtian Technology Co., Ltd. (hereinafter referred to as the “**Company**”) formulated this Rules in accordance with the relevant Chinese laws, rules, and regulations and laws, rules, and regulations of countries in which the Company operates (collectively “**applicable laws**”), as well as ZTT Compliance Guidelines and other compliance requirements, taking into account the environment in which the Company operates.

Article 2. The Rules apply to the operation activities of the Company and its foreign and domestic controlled subsidiaries (hereinafter referred to as “**Subsidiaries**”).

Article 3. The Rules apply to all Employees of the Company and its Subsidiaries, and the Third Parties which conduct business on behalf of the Company and Subsidiaries.

Article 4. Definitions:

- (1) “**Compliance**” means the adherence to the requirements of applicable laws, international conventions, Compliance Codes of International Organization, regulatory provisions, industrial standards, business practice, ethics and the Company’s articles of association and rules and regulations by the Company and Subsidiaries in their regular course of business.
- (2) “**Appropriate Compliance Department**”, depending on the entities responsible for the business operations, refers to the Compliance Standard Department of the Company; or the Compliance Department or Compliance Officer(s) of the Subsidiaries.
- (3) “**Third Parties**” refers to all entities such as agents, advisers and other intermediaries, consultants, representatives, distributors, contractors, subcontractors and suppliers, consortia, joint venture partners and other kind of third parties with whom it has business relationships or with whom it works to obtain orders or permits (whether an individual, partnership, corporation or unincorporated entity) engaged by the Company or any Subsidiaries in any forms or under any titles.
- (4) “**Gifts and Hospitality**” applicable to this Rules includes anything that the recipient could possibly consider valuable, such as properties or other benefits, including cash, gift cards, stocks, bonds and other securities, electronic

equipment, real estate, and other property or assets, as well as meals and entertainment (for example, concert, theater, sport, or other similar event tickets or invitations), travel, lodging, transportation, loans, use of property or assets or equipment, charitable donations, political contributions, medical treatment, job or internship offers or contracts, and employment of any kind.

- (5) “**Private Business Associate**” means a private, commercial business associate such as a current or potential customer, supplier, contractor, or vendor.
- (6) “**International Organizations**” include but not limited to the United Nations, International Monetary Fund (IMF), Organization for Economic Cooperation and Development (OECD); Multilateral Development Banks (“MDBs”) such as the African Development Bank and the World Bank, and the World Trade Organization (WTO).
- (7) A “**Public Official**” includes but not limited to:
 - i. Officials, employees, representatives of governments, and any other person authorized to act under official right;
 - ii. Officials, employees, or representatives of public international organizations;
 - iii. Officials, employees, or representatives of political organizations, or members of royal families, who exercise public authority; and
 - iv. Officials and employees of public enterprises, which are enterprises over which a government or governments exercise, directly or indirectly, a controlling or dominant influence.

The persons mentioned in items 1, 2 and 3 are collectively referred to as "government officials".

CHAPTER II. GIFTS GIVEN OR RECEIVED; HOSPITALITY RECEIVED

Article 5. Unless approved by the Chief Compliance Officer of the Company, all employees of the Company and its Subsidiaries shall not provide gifts and entertainment to current government officials or former government officials who have departed for less than three years. For the travel and accommodation of government officials due to official duties, please refer to Chapter 3 of this Rules. For Public Officials who are not government officials, other provisions of this Rules are still applicable.

Article 6. Employees and Third Parties are permitted to give reasonable and customary gifts to Private Business Associates or Public Officials (and to receive reasonable and customary gifts from Private Business Associates or Public Officials), but only if all of the following conditions are met:

1. The value of the gift cannot be in excess of the guidelines stated herein. No gifts can be provided that are outside of or otherwise not in compliance with the Company's or Subsidiaries' policies and the rules;

2. When the value of the gift exceeds any limits imposed by local laws, rules, or regulations, regardless of whether or not the gift otherwise is in compliance with the rules, Employees should seek guidance from Appropriate Compliance Department regarding any potentially applicable local limits;

3. The purpose of the gift is not to obtain an improper benefit or advantage;

4. The gift is a customary business gift given in connection with a recognized local gift-giving celebration or a legitimate business event;

5. The gift is not cash (or a cash-equivalent);

6. The gift is appropriate under the circumstances, transparent, and given in a manner that avoids any appearance of impropriety or embarrassment if publicly disclosed; and

7. The gift is not offered, given, or received at a critical time when important business decisions are being made, such as before or just after a bid is awarded or a contract is signed or renegotiated, or when a claim occurs.

All gifts must be properly recorded and submitted using the Compliance Reporting Form (Annex 2).

Article 7. Gifts to Private Business Associates or Public Officials exceeding a total value of ¥500 per person must be approved in writing in advance by using the Pre-Application Compliance Form (Annex 1).

The necessary approvals for gifts to or gifts or hospitality from Private Business Associates or Public Officials depend on the category of the gift. These approvals are summarized in the below Chart. Each Subsidiaries is free to adopt lower (but not higher) limits as needed to ensure that only reasonable and appropriate gifts can be made or received without pre-approval.

Chart of Approval Level for Giving Gifts & Hospitality

Category	VALUE (per person, per gift (given or received) or hospitality received)
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Project		Category 1 (below ¥500)	Category 2 (Equal to or Greater than ¥500, up to ¥1000)	Category 3 (Equal to or Greater than ¥1000, up to ¥2500)	Category 4 (Equal to or Greater than ¥2500)
Before G&H is given	Pre-Application Compliance Form (Annex 1) for Gifts or Hospitality to be Given	NO	YES	YES	YES
After G&H is given	Compliance Reporting Form (Annex 2) for Gifts or Hospitality Given	YES	YES	YES	YES
Supervisor of Business Unit Approval Required		YES	YES	YES	YES
Appropriate Compliance Department Prior Approval Required		NO	YES	YES	YES
Compliance Standard Department Prior Approval Required		NO	NO	YES	YES
Compliance Standard Department & Chief Compliance Director Prior Approval Required		NO	NO	NO	YES

Article 8. In all circumstances, offering, giving, or receiving the following categories of gifts is *forbidden*:

1. Personal discounts, commissions, or other forms of remuneration;
2. Cash, gratuities, payments of currency in any form, loans or advances, cash equivalents like gift certificates, gift vouchers, or shopping cards;
3. Equities, shares, bonds, and any similar form of ownership or debt interest in a company or other entity;

4. Free or discounted services like insurance, tuition fees, repair or improvement works, or similar preferential treatment; and;

5. Holiday or leisure packages, travel, lodging, or meals expenses (except as provided otherwise below).

Article 9. Employees and Third Parties should *avoid a pattern* of giving or receiving even modest value gifts, as this behavior may begin to take on the appearance of corruption or impropriety. Accordingly, the following rules will apply to annual gifts and hospitality amounts, which will be monitored by the Appropriate Compliance Department as appropriate:

1. Gifts offered or given to a Third Party **or other external institutions** must remain exceptional. Up to four times a year is acceptable, for instance at the end or beginning of the year or on a major national holiday;

2. Any single gift by any Employee equal or greater than ¥2500 will similarly be pre-approved only in exceedingly rare and extraordinary circumstances. This category is intended to be available for gifts to (or from) heads of state in meetings with senior management of the Company or Subsidiaries not related to specific or actual projects, and the limitation should never be easily exceeded. Prior to approving a gift above ¥2500, the relevant approvers must be comfortable that: (i) the gift is necessary under the circumstances or a less expensive alternative would not be appropriate; (ii) the recipient is not in a direct position to influence the award of business to the Company or Subsidiaries; and (iii) the gift will not be perceived by regulators to be an attempt by the Company or Subsidiaries to curry favor with the recipient. Because such gifts are exceedingly rare, it is expected that no party will be offered or given a gift of this value more than once in any two-year period;

3. Employees may not accept gifts or hospitality from the same Third Party or **other external institutions** more than twice a year, regardless of their individual or collective value.

Gifts or hospitality from Private Business Associates or Public Officials exceeding a total value of ¥500 per person must be reported in writing within 20 days of receiving the gift or hospitality by using the Gift or Hospitality Receipt Compliance Form (Annex 3) and gifts may have to be transferred to the Company or the relevant Subsidiaries or returned in the event the Appropriate Compliance Department considers it necessary or appropriate. There is a maximum limit of ¥800 per person on what may be accepted, above which the gift or hospitality either must be refused, returned, or must be given to the Company or the relevant Subsidiaries. Under all circumstances, any gift or hospitality of an inappropriate nature should not be accepted, but politely refused.

Chart of Approval Level for Received Gifts & Hospitality

Category	VALUE (per person, per gift (given or received) or hospitality received)
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Project				
		Category 1 (Up to ¥500)	Category 2 (Equal to or Greater than ¥500, up to ¥800)	Category 3 (Equal to or Greater than ¥800)
After gift is received	Gift or Hospitality Receipt Compliance Form (Annex 3) for Gifts	YES	YES	YES
Head of Business Sector Approval Required		YES	YES	YES
Appropriate Compliance Department Prior Approval Required		NO	YES	YES
Compliance Standard Department Prior Approval Required		NO	NO	YES

Article 10. Gifts and hospitality are provided on behalf of the relevant business unit of the Company or Subsidiaries and are to be paid by the relevant business unit of the Company or Subsidiaries. No Employee can pay personally for a gift or hospitality when the purpose relates to a business relationship.

CHAPTER III. TRAVEL AND ACCOMMODATION

Article 11. Travel and accommodation for a Public Official may only be related to inspections associated with contract performance or inspections related to transit of goods, and only when such inspections are specifically required or allowed by contract. When arranging for travel or accommodation or covering travel or accommodation expenses for a Public Official, the following should be ensured:

1. Prior approval by the Appropriate Compliance Department is always required. Prior approval should be sought and documented utilizing the Travel Expense Compliance Form (Annex 4);

2. Payments to cover expenses should, whenever possible, be paid directly to vendors (*e.g.*, hotels, airlines, and restaurants). If direct payment is not possible, reimbursement may be made only for expenses for which receipts are obtained;

3. Payments and reimbursements for travel or accommodation expenses are permissible only for the period of time directly related to the Company or Subsidiaries;

4. All expenses must be reasonable in value. Extravagant hotels must be avoided;

5. Cash allowances, honoraria, travel allowances, or any other allowances are not permitted.

6. No payment or reimbursement is permitted for the expenses of family members or personal guests of a Public Official.

Article 12. Any travel or accommodation expense related to customers or other Private Business Associates proposed to be paid or to be reimbursed by the Company or Subsidiaries must be carefully recorded and approved in accordance with applicable policies and rules, and must conform to all applicable contracts between a Private Business Associate and the Company or Subsidiaries. No payment or reimbursement is permitted for the expenses of family members or personal guests of a Private Business Associate.

CHAPTER IV. ENTERTAINMENT AND MEALS (HOSPITALITY GIVEN)

Article 13. Reasonable business entertainment and meals expenses are permitted under the Rules generally if the entertainment or meal is given with the intent only to offer a normal courtesy. In many countries business entertainment and meals with clients can be a customary way to initiate goodwill and trust in a business relationship and help facilitate the exchange of information. Goodwill and trust nonetheless must be sustained through fair and honest dealings and not through frequent or lavish business entertainment or meals. To avoid the appearance of impropriety, Public Officials and Private Business Associates may not receive any form of entertainment or meals before or soon after critical business award decisions are made.

Article 14. Entertainment and meals shall not be given with the intent of corruptly or improperly influencing a Public Official's or a Private Business Associate's objectivity in making decisions involving the Company or Subsidiaries. The Rules also expressly forbid any entertainment or meals that would be perceived as lavish or indecent, or that could damage the Company's or Subsidiaries' reputation (Although whether entertainment or a meal is lavish or indecent is solely for the Appropriate Compliance Department to determine).

Article 15. When providing routine and reasonable business entertainment expenses (such as a business lunch or dinner, or theater or other event ticket), Employees should ensure the following:

1. The meal or entertainment costs must be reasonable;

2. The meal or entertainment cost must avoid the appearance of impropriety, must be modest, and must be infrequent;

3. There must be a proper business purpose for the expense;

4. The expense must be in line with local customs and comply with any local laws; and

5. The expense must be properly, accurately, and promptly documented.

Article 16. Reimbursement is permitted only for expenses that are accompanied by receipts. The names of all the individuals entertained, including (i) the names, entities, and titles of the Employees who attended and (ii) for the guests, their names, employers, and titles should be included in the submitted Compliance Reporting Form (Annex 2). Employees must be in attendance; otherwise, the expense is a gift rather than entertainment or a meal. All requests for reimbursement must include the specific business purpose for the expenditure. Employees cannot pay for entertainment or meals personally to avoid having to report it or seek approval.

Article 17. In addition to the above rules relating to meals and entertainment, Employees may provide meals and entertainment to Private Business Associates and Public Officials, or accept meals or entertainment from Private Business Associates only if all of the following conditions are met:

1. The cost of meals or entertainment for Public Officials or Private Business Associates should not exceed the specified amounts without prior approval, and should not exceed an appropriate frequency;

2. Meals provided by regular Employees should not exceed ¥300 per person unless approved in advance using the Pre-Application Compliance Form (Annex 1) by the Employee's immediate Supervisor or Manager and, if greater than ¥500, also approved in advance by the Appropriate Compliance Department. Regular Employees are not permitted to provide meals or entertainment above ¥1000. Entertainment of Public Officials and Private Business Associates by regular Employees is prohibited;

3. Meals or entertainment provided by middle or above management cannot exceed ¥500 per person unless approved in advance using the Pre-Application Compliance Form (Annex 1) by the immediate Supervisor or Manager and the Appropriate Compliance Department, and if greater than ¥1000, also approved in advance by the Compliance Standard Department of the Company;

4. Meals or entertainment provided by Senior Management should be reasonable and appropriate for the business purpose after consultation with the Compliance Standard Department of the Company. Entertainment of Public Officials should be considered only rarely and for a demonstrable business purpose.

5. Meals and entertainment may not be given regularly or routinely, for example on a monthly basis, unless there is a demonstrable business purpose for doing so and only so long as that business purpose continues. Meals and entertainment for any

specific Public Official must not exceed two times in any one year, and for any Private Business Associate must not exceed five times in any one year, without the prior written approval of the Appropriate Compliance Department.

6. Employees must complete and submit the Compliance Reporting Form (Annex 2) to the Appropriate Compliance Department within 20 days of any meal or entertainment with a Public Official or Private Business Associate. The Compliance Reporting Form (Annex 2) must include the name, title, and employer of each Public Official, Private Business Associate, and all Employees who attended the meal or entertainment event.

Chart of Approval Level for Giving Entertainment and Meals

Category		VALUE (per person, per meal or entertainment event given)			
		Category 1 (Up to ¥300)	Category 2 (Equal to or Greater than ¥300, up to ¥500)	Category 3 (Equal to or Greater than ¥500, up to ¥1000)	Category 4 (ONLY for Country or Senior Management) (Equal to or Greater than ¥1000)
Project					
Before E&M is given	Pre-Application Compliance Form (Annex 1)	NO	YES	YES	YES
After E&M is given	Compliance Reporting Form (Annex 2)	YES	YES	YES	YES
Business Unit Supervisor Pre-Approval Required		NO	YES	YES	YES
Appropriate Compliance Department Prior Approval Required		NO	NO	YES	YES
Compliance Standard Department Prior Approval Required		NO	NO	NO	YES

Article 18. Where relevant, related or other expenses incurred as a consequence

of providing permitted meals or entertainment to Public Officials or Private Business Associates (e.g., permitted travel expenses) are subject to processing and approval in accordance with the relevant Chapter of the Rules.

CHAPTER V. COMPLIANCE RECORDS AND DOCUMENTATION MANAGEMENT

Article 19. Sufficient supporting documents must be retained for all gifts, hospitality, travel, meals, and entertainment. These documents must be fairly and accurately recorded in the appropriate accounting and financial records. Simply providing an invoice or receipt is not sufficient; as required above, the names, titles, and employers of every participant or recipient is required. It is forbidden to create any false, misleading, or fraudulent records, including for the purpose of concealing the purpose or nature of the gift, hospitality, travel, meals, or entertainment. Such documents must be maintained according to the applicable document retention policies of the Company or Subsidiaries.

Article 20. Employees and Third Parties are prohibited from making false, misleading, incomplete, inaccurate, or artificial entries in the Company's or Subsidiaries' books and records.

Article 21. Employees and Third Parties should retain copies of all forms they submit and other documents they create under the rules for audit purposes.

Article 22. The Appropriate Compliance Department shall inspect the forms or other documents recorded and submitted by the employees regularly, to ensure that the approval system is effective and reliable. The matters to be inspected include but not limited to whether the provision or acceptance of gifts, hospitality, travel, accommodation, entertainment and meal is strictly reviewed and complies with compliance requirements, and whether sufficient supporting documents are being retained etc.

CHAPTER VI. DISCIPLINE

Article 23. Failure to comply with the Rules will be grounds for disciplinary action, up to and including termination of employment, consistent with the Company's or Subsidiaries' disciplinary process and any applicable laws.

Article 24. Employees and Third Parties violating anti-corruption and other applicable laws risk prosecution by relevant investigating authorities which may result in a personal fine and/or imprisonment.

CHAPTER VII. SUPPLEMENTARY PROVISIONS

Article 25. Any questions concerning the rules should be addressed to the

Appropriate Compliance Department.

Article 26. The Compliance Standard Department, on behalf of the Company, exercises the supervision on the implementation of this Rules in its departments, and it has the ultimate right to instruct and interpret the implementation of this Rules.

ANNEXES

Annex 1: Pre-Application Compliance Form

Annex 2: Compliance Reporting Form

Annex 3: Gift or Hospitality Receipt Compliance Form

Annex 4: Travel Expense Compliance Form

Annex 5: Chart of Gift or Hospitality Approval Process

ANNEX 1: Pre-Application Compliance Form

PRE-APPLICATION COMPLIANCE FORM

(Use this form to obtain prior approval for gifts or hospitality exceeding ¥300 per person, meals or entertainment sought by employees exceeding ¥300, and meals or entertainment sought by senior or above management exceeding ¥500 per person.)

<u>THE GIFT, HOSPITALITY, MEAL, OR ENTERTAINMENT</u>		
Description:		Amounts (if applicable):
Value: Total: _____ Per Person: _____		Converted into RMB: Total: _____ Per Person: _____
Purpose / Occasion surrounding the expense, including specifically the business justification:		
Has the Gift already been Given or Received? <i>(Select and complete appropriate box on the right)</i>	Yes, Given or Received on the following Date: (Please attach an explanation of the reasons justifying the absence of prior approval)	Dates of the most-recent past and next future bids before all recipients' or givers' employers, or names of ongoing projects in execution for or with the recipient or giver:
	No, it is to be Given on the following Date:	
<u>EXPECTED RECIPIENT(S)</u>		
Recipient Name, Telephone Number, and Email Address:		
Recipient Title / Position:		
Recipient Employer Name:		
<u>THE PROVIDER OF THE GIFT (complete only if different to the YOUR DETAILS section below)</u>		

Provider Name & Contact Details:		
Provider Title / Position:		
Provider's Employer Details (name and address):		
<u>OTHER KEY DETAILS</u>		
Is the recipient a government official? (refer to Article 4)		Yes / No
Is either the Recipient a Public Official?		Yes / No
Is either the Recipient related to or an associate of a Public Official?		Yes / No
Does the amount of gift and entertainment provided exceed the limit? (refer to Article 9 and Article 17)		Yes / No
Is the number of gifts provided exceeding the standard? (refer to Article 9 and Article 17)		Yes / No
Whether the gift offered or received is prohibited gift (refer to Article 8)?		Yes / No
Is there any invoice or receipt for gifts and entertainment?		Yes / No
Does any Giver, Recipient, or any Giver's or Recipient's Employer, currently have any business pending (e.g., a contract, application, tender, approval, etc.) with each other? Yes / No		
<i>If Yes, please provide full details (use a second page if necessary):</i>		
Has the Giver or Recipient received other gifts/hospitality from the same gift- or hospitality giver within the past twelve months? Yes / No		
<i>If Yes, please describe each prior gift, its value and date received (use a second page if necessary):</i>		
Has the provider or recipient provided or received prohibited gifts or entertainment in the past 12 months?		Yes / No
<i>If Yes, please describe the reason for the previous violation (use a second page if necessary):</i>		
<u>YOUR DETAILS</u>		
Your Signature:	Your Name:	Today's Date:
Your telephone number:		Your email address:

Your Business Unit:		Your Location:	
<u>APPROVAL DETAILS</u>			
<i>(Where necessary. Please refer to the ZTT Compliance Rules on Gifts and Hospitality.)</i>			
Supervisor of Business Unit:	Comments:	Signature:	Approval Date: DD/MM/YY
Appropriate Compliance Department: (If required)	Comments:	Signature:	Approval Date: DD/MM/YY
Compliance Standard Department: (If required):	Comments:	Signature:	Approval Date: DD/MM/YY
Chief Compliance Officer: (If required)	Comments:	Signature:	Approval Date: DD/MM/YY

Remember to:

(1) send a copy of all completed forms to the appropriate compliance department prior the Gift/Hospitality event; (2) following the Gift or Hospitality event send a copy of this form to your expense claim form if giving a gift; (3) send a copy of all completed forms to the Appropriate Compliance Department within 20 days of the Gift or Hospitality event; (4) ensure that you keep the original copy form for your own records; and (5) that Annex 2 must be completed after the gift or hospitality, regardless of whether Annex 1 is required.

ANNEX 2: Compliance Reporting Form

COMPLIANCE REPORTING FORM

Use this form to report all gifts, hospitality, meals, and entertainment, regardless of whether a Pre-Approval Compliance Form was required.

<u>THE EXPENSE</u>	
Description:	Amounts (if applicable):
Value: Total: _____ Per Person: _____	
Converted into RMB: Total: _____ Per Person: _____	
Purpose / Occasion surrounding the expense, including specifically the business justification:	
Date the expense was incurred: DD/MM/YY	
<u>THE RECIPIENT</u>	
Recipient Name, Telephone Number, and Email Address:	
Recipient Title / Position:	
Recipient's Employer:	
If pre-approval was required and there is any difference between the above and the recipient or recipients identified on the pre-approval form, please explain why there was a difference.	
Dates of the most-recent past and next future bids before all recipients' employers:	
<u>THE PROVIDER (complete only if different to the YOUR DETAILS section below)</u>	
Provider Name & Contact Details:	
Provider Title / Position:	

Provider's Employer Details (name and address):

OTHER KEY DETAILS

Is the recipient a government official? (refer to Article 4) **Yes / No**

Is either the Recipient or the Giver a Public Official? **Yes / No**

Is either the Recipient or the Giver related to or an associate of a Public Official? **Yes / No**

Does the amount of gift and entertainment provided exceed the limit? (refer to Article 9 and Article 17) **Yes / No**

Is the number of gifts provided exceeding the standard? (refer to Article 9 and Article 17) **Yes / No**

Whether the gift offered or received is prohibited gift (refer to Article 8)? **Yes / No**

Is there any invoice or receipt for gifts and entertainment? **Yes / No**

Does any Giver, Recipient, or any Giver's or Recipient's Employer, currently, have any business pending (e.g., a contract, application, tender, approval, etc.) with each other? **Yes / No**

If Yes, please provide full details (use a second page if necessary):

Has the Giver or Recipient received other gifts/hospitality from the same gift- or hospitality giver within the past twelve months? **Yes / No**

If Yes, please describe each prior gift, its value and date received (use a second page if necessary):

Has the provider or recipient provided or received prohibited gifts or entertainment in the past 12 months? **Yes / No**

If Yes, please describe the reason for the previous violation (use a second page if necessary):

YOUR DETAILS

Your Signature:	Your Name:	Today's Date:
Your telephone number:	Your email address:	
Your Business Unit:	Your Location:	

<u>APPROVAL DETAILS</u>			
Supervisor of Business Unit:	Comments:	Signature:	Approval Date: DD/MM/YY

Remember to: (1) send a copy of all completed forms to the Appropriate Compliance Department within 20 days of the Gift or Hospitality event; (2) attach a copy of this form to your expense claim form if giving a Gift or Hospitality; and (3) ensure that you keep the original copy form for your own records.

ANNEX 3: Gift or Hospitality Receipt Compliance Form

GIFT OR HOSPITALITY RECEIPT COMPLIANCE FORM

(Reporting receipt of gifts or hospitality)

<u>THE GIFT OR HOSPITALITY</u>	
Description:	Amounts (if applicable):
Value (per person):	Converted into RMB (per person):
Date received:	
Name, title, and employer of person from whom the gift or hospitality was received:	
Name, title, and employer of person on whose behalf the gift or hospitality was received (if different than above):	
Dates of the most-recent past or next future bids before the provider or the provider's employer, or of any ongoing projects with the employer:	
Have you or your business unit received other gifts or hospitality from the same provider within the past twelve months? Yes / No <i>If Yes, please describe each prior gift or hospitality, the per-person value, and date received (use a second page if necessary):</i>	
Is the recipient a government official? (refer to Article 4)	Yes / No
Is the provider a public officer? (refer to Article 4)	Yes / No
Does the provider has relationship with the public officer?	Yes / No
Does the amount of gift and entertainment provided exceed the limit? (refer to Article 9 and Article 17)	Yes / No
Is the number of gifts provided exceeding the standard? (refer to Article 9 and Article 17)	Yes / No
Whether the gift offered or received is prohibited gift (refer to Article 8)?	Yes / No
Has the provider or recipient provided or received prohibited gifts or entertainment in the past 12 months?	Yes / No
<i>If Yes, please describe the reason for the previous violation (use a second page if necessary):</i>	
<u>YOUR DETAILS</u>	

Your Signature:	Your Name:	Today's Date:	
Your telephone number:		Your email address:	
Your Business Unit:		Your Location:	
<u>APPROVAL DETAILS</u>			
Supervisor of Business Unit:	Comments:	Signature:	Approval Date: DD/MM/YY
Appropriate Compliance Department: (If required)	Comments:	Signature:	Approval Date: DD/MM/YY
<p>Appropriate Compliance Department 's Comments on Receiving Gifts or Hospitality of Greater than ¥300:</p> <p style="text-align: right;">Signature:</p> <p style="text-align: right;">Name:</p> <p style="text-align: right;">Approval Date: DD/MM/YY</p>			

Remember to: (1) send a copy of all completed forms to the Appropriate Compliance Department within 20 days of the Gift or Hospitality event; (2) ensure that you keep the original copy form for your own records.

ANNEX 4: Travel Expense Compliance Form

TRAVEL EXPENSE COMPLIANCE FORM

(Seeking pre-approval to purchase travel for a Public Official)

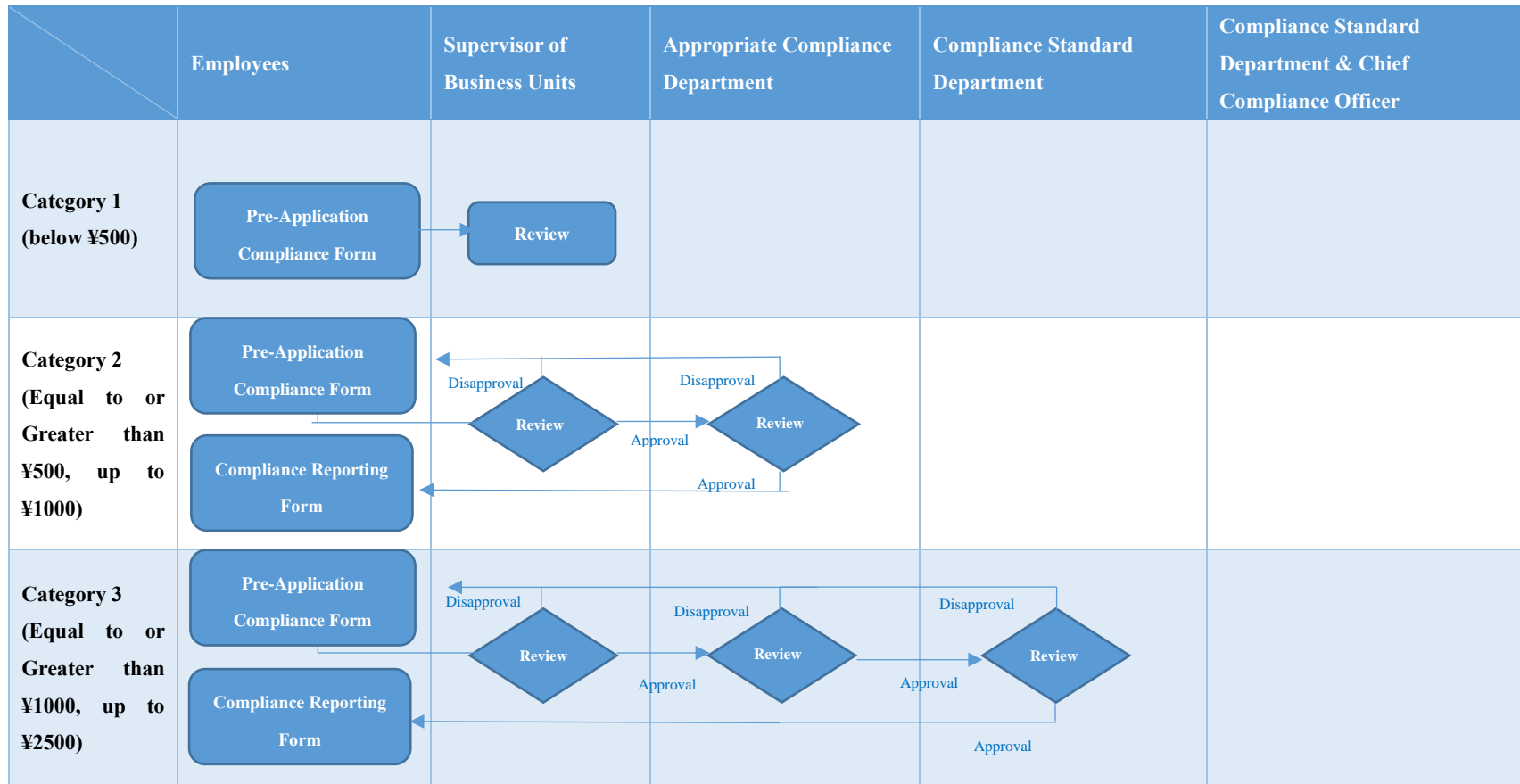
<u>THE TRAVEL REQUESTED</u>	
Description (e.g., means of transportation, fare class, room type)	
Value: Total: _____ Per Person: _____	
Converted into RMB: Total: _____ Per Person: _____	
Dates of proposed travel and duration of stay:	
Name, title, and employer of person who will travel:	
Dates of the most-recent past or next future bids before the traveler or the traveler's employer; or of any ongoing projects with the employer:	
Please describe the business purpose of the proposed travel:	
Please attach a proposed travel itinerary and a proposed agenda for the duration of the trip:	
Has this person taken other travel at our expense over the last 12 months?	Yes / No
Is the traveler a government official? (refer to Article 4)	Yes / No
Is the traveler a public officer? (refer to Article 4)	Yes / No
Does the traveler has relationship with the public officer?	Yes / No
If the traveler is a public officer, is his/her spouse, child and other close relative travelling together?	Yes / No
Is the hotel where the traveler stays a high-end luxury hotel?	Yes / No
Has the travel and accommodation period exceeded the period required for direct business with the company?	Yes / No
Is there any invoice or receipt for travelling and accommodation?	Yes / No
<i>If Yes, please describe each prior travel itinerary, cost, and purpose:</i>	

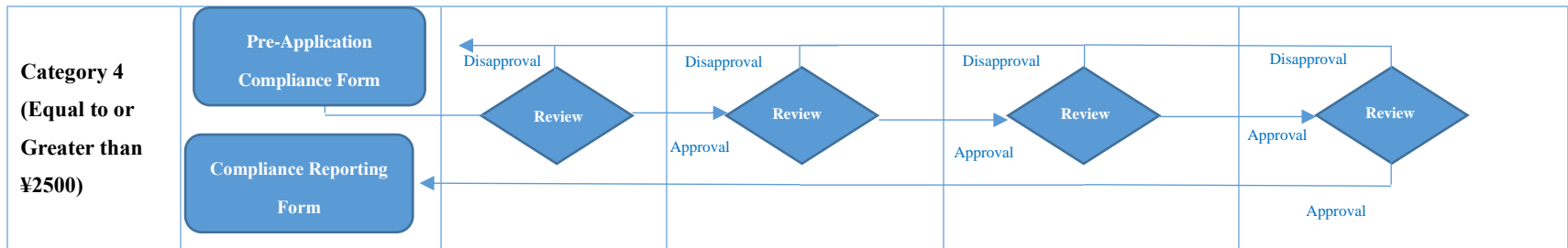
<u>YOUR DETAILS</u>			
Your Signature:	Your Name:	Today's Date:	
Your telephone number:		Your email address:	
Your Business Unit:		Your Location:	
<u>APPROVAL DETAILS</u>			
Supervisor of Business Unit:	Comments:	Signature:	Approval Date: DD/MM/YY
Appropriate Compliance Department:	Comments:	Signature:	Approval Date: DD/MM/YY

Remember to: (1) send a copy of all completed forms to the Appropriate Compliance Department;
(2) ensure that you keep the original copy form for your own records.

ANNEX 5: Chart of Gift or Hospitality Approval Process

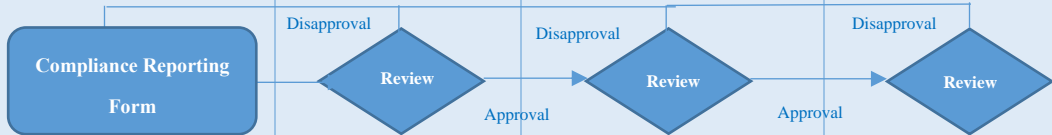
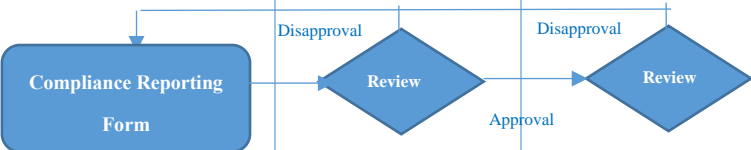
Approval Process of Gift Provision





Approval Process of Gift Acceptance

	Employees	Supervisor of Business Units	Appropriate Compliance Department	Compliance Department	Standard
Category 1 (below ¥500)	Compliance Reporting Form	Review			
Category 2 (Equal to or Greater than ¥300, up to ¥800)	Compliance Reporting Form	Review	Review		
Category 3 (Equal to or Greater than ¥800)	Compliance Reporting Form	Review	Review	Review	



Approval Process for Hospitality

