

## **Statement on Anti-Corruption**

The Company believes that corruption and bribery undermines fair competition. The integrity, honesty, and transparent operation principles are the foundation for the long-term development of the Company. The Company strictly prohibits any form of corruption or bribery, and is committed to complying with all applicable anti-corruption laws and regulations in the regions where we operate, and conducting business legally and in compliance.

To create an upright, pragmatic, open and transparent work environment, the Company actively takes corresponding measures to establish an anti-corruption compliance management system. The Company ensures the effectiveness and continuous improvement of the system through risk identification and assessment, compliance policies and controls, compliance training and communication, investigations and monitoring. The Company expects and requires every employee to strictly adhere to the Company' s anti-corruption policies:

### **1. Prohibition of Bribery in Any Form**

- Do not directly or indirectly offer bribes to any entities or individuals through financial benefits or other means (including but not limited to facilitation payments or kickbacks) to obtain trading opportunities, competitive advantages, or any other improper benefits;

## 2. Gifts and Hospitality

- Gifts and hospitality should be provided for legitimate commercial reasons, at an appropriate value, and must comply with local laws, regulations and cultural practices. Additionally, they must not violate the policies or regulations of the recipient' s company regarding gifts and hospitality;

## 3. Business Partner Management

- Ensure that transactions with business partners are authentic, reasonable, and necessary. Do not instigate, induce, or assist business partners in any form of bribery or corruption;
- Require business partners, when acting on behalf of or in the cooperation with the Company, to refrain from bribing any Company employee and third parties in any form and from engaging in any other forms of corruption;

## 4. Prohibited Solicitation and Acceptance

- No person shall, by virtue of the power conferred by the Company or the opportunities arising from their employment, directly or indirectly (including via family members, acquaintances and cooperating parties) demand or receive any property, gift or other benefit in any form from any unit or person having business relations with the Company;
- Maintain integrity and self-discipline in interactions with colleagues. Do not offer any financial benefits or other forms of benefits to

superiors or other colleagues with whom you have a professional interest;

- Refuse immediately any improper gifts or benefits offered or solicited by any entities and individuals related to the Company's business and report such offers or solicitations to the Company promptly. Any gifts received must be promptly reported and handled to the Company in accordance with the Company's rules and regulations;

#### 5. Charitable Donations and Sponsorships

- All donations and sponsorships shall be based on genuine public welfare or legitimate commercial purposes.
- All relevant personnel shall strictly comply with the decision-making procedures and approval authority requirements under the *External Donation Management Measures*.
- Complete records shall be maintained for all donations and sponsorships.
- Major donations shall be disclosed in periodic reports or social responsibility reports in accordance with applicable requirements.

#### 6. Asset and Authority Management

- Do not embezzle or misappropriate funds or assets belonging to the Company, customers, or business partners;
- Do not exceed or abuse authority, or harm the interests of the Company through fraud or any other means;

#### 7. Timely Reporting

- Upon discovering any instances of corruption and bribery involving employees, promptly report such conduct to the Company.

Violation of applicable laws and regulations and the above policies may expose individual employees and the Company to serious civil, administrative and criminal penalties, and may also subject individual employees to the Company' s disciplinary actions and/or termination of employment contracts.

### **Complaints and Reporting**

If you have any opinions or concerns regarding anti-corruption, please contact us through the following channels. The Company will strictly keep your identity confidential and protect you from retaliation.

- Email: [sf5198@sf-express.com](mailto:sf5198@sf-express.com)
- SF official website: About Us - I want to report
- Mail to SF: SF HQ - Audit of the Group (Receiver)
- Forespace App: Service - I want to report

This statement has been approved by the Company' s Executive management and shall take effect from the date of issuance.

This statement applies to SF Holding Co., Ltd. and its subsidiaries and branches worldwide.