

# 内蒙古伊利实业集团股份有限公司反腐败政策

## Anti-Corruption Policy of Inner Mongolia Yili Industrial Group Co., Ltd.

内蒙古伊利实业集团股份有限公司（以下简称“公司”）承诺遵照国家有关法律、法规和规章制度开展公司反腐败工作。为保障公司诚信廉洁、风清气正的文化氛围，防范和控制腐败风险，公司结合实际情况，根据相关法律法规及《公司章程》等相关文件，特制订本政策。

Inner Mongolia Yili Industrial Group Co., Ltd. (hereinafter referred to as "the Company") is committed to carrying out anti-corruption efforts in compliance with applicable national laws, regulations, and rules. To uphold a corporate culture of integrity and transparency, and to prevent and control corruption risks, the Company has formulated this policy based on its actual conditions, relevant laws and regulations, the Company's Articles of Association and other relevant documents.

### 1.适用范围 Scope of Application

本政策适用于集团公司各部门及所属各事业部、分（子）公司（含海外运营地）全体员工，同时，也适用于所有与我司存在合同关系的外部相关方，包括但不限于公司经销商、供应商、承包商、物流配送商等合作单位（以下简称“合作方”）。

This policy applies to all employees of the Yili Group's departments, business units, and branches (subsidiaries) (including overseas operations). It also applies to all external parties with contractual relationships with the Company, including but not limited to the Company's distributors, suppliers, contractors, logistics providers, and other partners (hereinafter referred to as "Partners").

### 2.定义 Definition

腐败行为指违反国家法律法规、公司制度或者背离公司价值观，为谋取个人或单位、小团体利益，采取各种不正当手段获取不当利益的故意行为（包括但不限于收受贿赂，滥用职权，营私（徇私）舞弊，侵占或者挪用公司财物等行为），且行为对公司造成了经济或非经济损失。

Corrupt practices refer to intentional acts that violate national laws and regulations, Company policies, or deviate from the Company's values, aimed at obtaining improper benefits for

individuals, units, or small groups through improper means (including but not limited to bribery, abuse of authority, favoritism and fraud, embezzlement or misappropriation of Company assets, etc.), resulting in economic or non-economic losses to the Company.

### **3. 职责 Responsibilities**

#### **3.1 内部员工 Internal Employees**

公司各级员工必须遵守国家法律法规和行业准则规范，严格执行公司规章制度，积极践行公司价值观，在任何时候都能保持公平、公正和诚信原则，坚守反腐败行为底线，不滥用公司赋予的权力，始终防范任何侵害公司利益的行为发生。

员工如果认为存在腐败行为，或认为某项活动、行为可能导致腐败，有责任对事项进行制止或举报。

All employees must comply with national laws, regulations, and industry standards, strictly implement Company policies, actively uphold the Company's values, maintain principles of fairness, impartiality, and integrity at all times, adhere to the bottom line against corrupt acts, refrain from abusing authority granted by the Company, and consistently prevent any acts that may harm the Company's interests. Employees who become aware of corrupt practices or activities that may lead to corruption are obligated to stop or report such matters.

#### **3.2 合作方 Partners**

公司要求与公司有业务关系的所有合作方必须严格遵守国家法律法规和行业准则规范及《阳光协议》条款，杜绝任何舞弊行为发生，积极营造廉洁、风清气正的营商环境。合作方如果认为存在腐败行为，或认为某项活动或行为可能导致腐败，有责任对事项进行制止或举报。

The Company requires all Partners with business relationships to strictly comply with national laws, regulations, industry standards, and the terms of the Anti-Corruption Agreement, eliminate any fraudulent practices, and actively foster a clean and transparent business environment. Partners who become aware of corrupt practices or activities that may lead to corruption are obligated to stop or report such matters.

### **4. 反腐败规定 Anti-Corruption Provisions**

#### **4.1 对本公司员工的反腐败规定 Provisions for Employees**

公司员工要廉洁自律，在履职过程中不得接受相关方金钱、实物、提供的娱乐、消费及

以其他任何方式获取利益；禁止员工私自利用职权、或可能影响客观公正履行职责的私人关系，破坏公平竞争规则，使相关方得到有失公平的特殊待遇；禁止员工为谋取不正当利益向他人行贿。具体要求请参见公司内部管理制度《伊利集团反舞弊工作管理办法》。

Employees must maintain integrity and self-discipline. During the performance of duties, they shall not accept money, physical objects, entertainment, consumption, or any other benefits from relevant parties. Employees are prohibited from using their authority or personal relationships that may affect objectivity and fairness, undermining fair competition rules to provide unfair preferential treatment to relevant parties. Employees are prohibited from offering bribes to others for improper gains. For specific requirements, refer to the internal management policy "Yili Group Anti-Fraud Management Measures."

#### **4.2 对合作方的反腐败规定 Provisions for Partners**

禁止合作方为争取己方利益，以任何名义或任何形式向公司员工进行商业贿赂，包括但不限于提供金钱、馈赠礼品、高消费餐饮娱乐活动以及其他为私人提供好处或利益的行为。合作方人员不得与公司员工合谋或者配合公司员工侵占公司财物。具体要求请参见《阳光协议》。

Partners are prohibited from offering commercial bribes to Company employees in any name or form, including but not limited to providing money, gifts, high-consumption catering and entertainment, or any other benefits for personal gain. Personnel of Partners shall not collude with or assist Company employees in embezzling Company assets. For specific requirements, refer to the "Anti-Corruption Agreement".

#### **5. 针对反腐败的培训 Anti-Corruption Training**

公司针对新老员工（含劳务外包三方人员）、合作方，通过多种方式开展本政策及相关制度的培训，以便员工、合作方知晓本政策和相关制度。

The Company conducts training on this policy and related regulations for all employees (including new hires, existing staff, third-party outsourced personnel) and partners through various methods, ensuring that both employees and partners are fully informed of and comply with these policies and systems.

#### **6. 监督检查 Supervision and Inspection**

伊利对所有业务开展反贿赂和反腐败监督检查工作。公司依据《伊利集团反舞弊工作管理办法》等管理制度，对集团所有部门及所属各事业部、分（子）公司（含海外运营地）开展反贿赂和反舞弊审计或专项调查（至少每三年覆盖所有运营业务）。针对监督检查中发现的问题，及时整改，并持续优化和完善相关管理制度。检查结果及时上报公司最高管理层和董事会。

在供应商准入环节，公司依据《伊利集团供应商合规性管理规范》中的商业道德要求，对供应商的利益申报和廉洁合规情况进行审核。

The Company conducts anti-bribery and anti-corruption oversight across all its business operations. In accordance with internal policies such as the “Yili Group Anti-Fraud Management Measures”, the Company conducts anti-bribery and anti-fraud audits or special investigations across all departments, business units, branches, and subsidiaries (including overseas operations). Audits and investigations will be conducted at least once every three years for all operations. Issues identified during supervision and inspection will be promptly addressed, with continuous improvements to the relevant management systems. Inspection results will be promptly reported to the Company's top management and the Board of Directors.

The Company reviews suppliers' declarations of interests and integrity compliance practices. The reviews are as part of the supplier onboarding process, and are in accordance with the business ethics requirements set forth in the “Yili Group Supplier Compliance Management Standard”.

## **7.奖惩规定 Rewards and Penalties**

公司对证实有腐败行为的员工会追究责任，公司会按相关规定予以相应的处分，情节严重触犯法律的，移交司法机关追究法律责任。具体要求请参见公司内部管理制度《伊利集团反舞弊工作管理办法》。

合作方违反《阳光协议》约定或本政策的，公司将按《阳光协议》约定启动相应的惩罚措施。涉嫌犯罪的，公司将提请司法机关追究刑事责任。

Employees found engaging in corrupt practices will be held accountable and will be imposed corresponding disciplinary sanctions in accordance with relevant regulations. Severe cases involving legal violations will be referred to judicial authorities. For specific requirements, refer to the internal management policy "Yili Group Anti-Fraud Management Measures."

Partners violating the Anti-Corruption Agreement or this policy will face penalties as stipulated in the Sunshine Agreement. Cases involving suspected crimes will be referred to judicial authorities.

### **8.投诉与举报 Complaints and Reporting**

公司员工或者合作方如果发现（或有合理理由怀疑）其工作范畴中存在的任何不当行为或不法行为，应尽快向公司纪委办或直接向公司董事长投诉举报（投诉举报电话：0471-3357805；电子邮箱：yljw@yili.com；yilijubao@163.com；pangang@yili.com）。举报方将受到保护，具体信息请参考《伊利集团反舞弊工作管理办法》。

Employees or Partners who discover (or have reasonable grounds to suspect) any misconduct or illegal activities within their scope of work should report to the Company's Discipline Inspection Commission or directly to the Chairman of the Board (Report Hotline: 0471-3357805; Email:yljw@yili.com; yilijubao@163.com; pangang@yili.com). The reporter will be protected. For details, refer to the "Yili Group Anti-Fraud Management Measures."

### **9.政策回顾 Policy Review**

公司定期根据法律法规、自身业务发展、行业通用惯例及良好标准对本政策进行审视和更新。

The Company will periodically review and update this policy based on legal and regulatory changes, business development, industry common practices, and good practices.

内蒙古伊利实业集团股份有限公司

Inner Mongolia Yili Industrial Group Co., Ltd.

二〇二三年十二月十三日

13 December 2023