

## **Mengniu Anti-Commercial Bribery and Anti-Corruption Policy**

“Integrity and honesty support our continued success” is one of Mengniu’s core values. A fair and clean public image is a key reason behind Mengniu’s leading position and excellent reputation in the industry and a key cornerstone for the long-term trust it commands from consumers, customers, and business partners. Mengniu adheres to high standards of business conduct, commits to complying with anti-commercial bribery and anti-corruption laws and regulations, and adopts a zero-tolerance approach toward any form of commercial bribery or corrupt conduct.

### **References**

Mengniu strictly complies with all applicable laws and regulations and formulates the Mengniu Anti-Commercial Bribery and Anti-Corruption Policy (hereinafter referred to as the “Policy”) with reference to the anti-corruption principle of the United Nations Global Compact. In case of any conflict or inconsistency between the Policy and any applicable law or regulation, the applicable law or regulation shall prevail.

### **Scope**

This Policy applies to China Mengniu Dairy Company Limited and all its employees (including full-time, part-time, and contractor's employees).

It also applies to all of Mengniu's business partners (including but not limited to professional consultants, suppliers, distributors, logistics providers, and contractors).

### **Content**

#### **1. Definitions**

- “Commercial bribery” refers to the act of providing, promising, facilitating, or authorizing the provision of financial or other benefits, either directly or through a

third party, to a counterparty in a transaction or any other entity that may influence the transaction to secure business opportunities or competitive advantages.

- “Corruption” refers to any violation of laws or regulations or breach of social ethics where one exploits their job authority or position for personal financial gain or other illicit benefits. Acts of corruption include but are not limited to offering and accepting bribes.

## **2. Provisions**

### **2.1 Employees of the Company shall**

- Perform their job duties in compliance with laws and regulations and must not engage in any form of (soliciting, accepting, or offering) commercial bribery or corruption regardless of whether they are operating in China or overseas;
- Adhere to the Company's anti-commercial bribery and anti-corruption compliance requirements;
- Comply with local legislation and regulations, as well as other applicable legislation and regulations, when handling company business in China or overseas;
- Attend anti-commercial bribery and anti-corruption training;
- Proactively identify, report, and control anti-commercial bribery and anti-corruption compliance risks in their business operations; and
- Proactively report commercial bribery acts and provide leads on commercial bribery conduct.

### **2.2 Business partners shall**

- Commit to complying with anti-commercial bribery and anti-corruption laws and regulations and not engaging in any form of commercial bribery or corruption during operations, including but not limited to offering or accepting, either directly or through a third party, cash, gifts, securities, goods, rebates, travel or entertainment expenses, or non-monetary benefits such as employment

opportunities;

- Proactively report commercial bribery acts and provide leads on commercial bribery conduct;
- Attend anti-commercial bribery and anti-corruption training; and
- For suppliers, develop anti-commercial bribery and anti-corruption policies tailored to their operational practices and verify the compliance of such policies.

### **3. Training and Communication**

Mengniu regularly conducts communication and training sessions on this Policy and related systems for all employees and business partners through conferences, distribution of materials, and signing of commitment letters to ensure that employees and business partners are informed about this Policy and related systems.

### **4. Supervision and Inspection**

- Mengniu conducts annual anti-commercial bribery and anti-corruption supervisions and inspections across all business operations. Issues identified in the inspections shall be promptly rectified, with continuous improvements to the relevant management systems.
- Mengniu conducts supplier inspection as per the business ethics requirements set out in the Supplier Code of Conduct.
- Mengniu reviews the anti-corruption and integrity compliance practices of suppliers in the onboarding process.

### **5. Consequences of Violations**

- For individuals found in violation, Mengniu will impose penalties as per internal regulations. Those suspected of illegal or criminal activities will be referred to judicial authorities as per the law.
- For suppliers who violate this Policy or cause significant economic, brand, or reputational losses to Mengniu, the Company will terminate the partnership,

blacklist the supplier, and implement appropriate penalties.

## **6. Complaints and Reporting**

- Mengniu provides an independent 24-hour reporting hotline and releases ways of receiving complaints and reports through multiple channels. It encourages employees, business partners, and the public to report illegal and non-compliant behaviors.
- The Company has established a dedicated integrity department responsible for investigating and handling reports of misconduct, dereliction of duty, and corruption. If you have reasonable grounds to suspect a violation of this Policy has occurred or is likely to occur, you may report it through the following channels:

Phone: 0471-7393612

Email: mnjw@mengniu.cn;

compliance@mengniu.cn

Mailing Address: Mengniu Dairy Milk Source Building 311, Shengle Economic  
Zone of Horinger, Hohhot, Inner Mongolia

Postal Code: 011517

- Mengniu provides protection for whistle-blowers' information security and personal safety at every appeal and report process and ensures strict confidentiality in the handling process, with details disclosed only to relevant personnel. The Company resolutely safeguards the legitimate rights and interests of whistle-blowers, thereby ensuring they will face no retaliation or unfair treatment for reporting.

## **7. Policy Supervision and Updates**

The content of this Policy is supervised by the integrity department, which reports to the Company's senior management and the Audit Committee on anti-commercial

bribery and anti-corruption supervision practices. The Audit Committee regularly updates the Board of Directors on the implementation of the Policy.

The Policy is reviewed annually, and its content will be updated as necessary.