

## 北京六合宁远医药科技股份有限公司

## 反舞弊、反贿赂及反不正当竞争管理制度

Anti-fraud, Anti-bribery and Anti-unfair  
competition Management System

角色 Role	姓名 Name	部门/职务 Department/Position	签名/日期 Signature/Date
起草人 Author	贾文杰	运营经理	2022年3月30日
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## 第一章 总 则

## Chapter I General Provisions

**第一条** 为加强公司治理和内部控制的规范化、制度化建设, 防治舞弊、贿赂及不正当竞争行为, 切实维护公司的良好形象和信誉, 强化公司治理舞弊、贿赂、不正当竞争的高效预警机制, 保障公司和股东合法权益, 根据《中华人民共和国反不正当竞争法》、《中华人民共和国公司法》、《企业内部控制基本规范》及企业内部控制配套指引、《关于禁止商业贿赂行为的暂行规定》等相关法律、法规、规范性文件要求和《公司章程》的规定, 结合公司的实际情况, 特制定本制度。

No. 1 in order to strengthen the standardization and institutionalization of corporate governance and internal control, prevent fraud, bribery and unfair competition, earnestly maintain the good image and reputation of the company, strengthen the long-term early warning mechanism of corporate governance fraud, bribery and unfair competition, and protect the legitimate rights and interests of the company and shareholders, according to the Anti Unfair Competition Law of the people's Republic of China This system is formulated in accordance with the company law of the people's Republic of China, the basic norms of enterprise internal control, the supporting guidelines of enterprise internal control, the Interim Provisions on the prohibition of commercial bribery and other relevant laws, regulations, normative document requirements and the provisions of the articles of association, and in combination with the actual situation of the company.

**第二条** 公司高度重视所有经营管理活动中的反舞弊、反贿赂及反不正当竞争管控, 禁止损害公司利益和社会公共利益的舞弊、贿赂及不正当竞争行为, 尤其禁止公司员工和相

关人员，以及以公司名义或为公司利益开展业务的商业伙伴，通过贿赂国家工作人员和交易对方的员工、代理以及其他可能利用职权或影响力影响交易的主体和个人，以实现获取竞争优势或其他不当利益的目的。公司同样禁止向公司内部实施的反向贿赂行为。

**No. 2** The company attaches great importance to the control of anti-fraud, anti-bribery and anti-unfair competition in all operation and management activities, and prohibits fraud, bribery and unfair competition that harm the interests of the company and the public interest, especially the employees and relevant personnel of the company, as well as business partners who conduct business in the name or for the interests of the company, By bribing national staff, employees and agents of the counterparty and other subjects and individuals who may use their power or influence to influence the transaction, in order to achieve the purpose of obtaining competitive advantage or other improper interests. The company also prohibits reverse bribery to the company.

**第三条** 反舞弊、反贿赂及反不正当竞争工作的宗旨是规范公司董事、监事、高级管理人员及一般员工的职业行为，以增强全员合规意识和履行合规职责，严格遵守国家有关反舞弊、反贿赂及反不正当竞争的法律法规、规章制度和其他规范性文件及公司规章制度，树立廉洁自律和勤勉敬业的良好职业道德与行为准则，并有效预防和处置潜在的合规风险，防止损害公司及股东利益的行为发生。

**No. 3** The purpose of anti-fraud, anti-bribery and anti-unfair competition is to standardize the professional behavior of the company's directors, supervisors, senior managers and general employees, so as to enhance the compliance awareness and perform compliance responsibilities of all employees, and strictly abide by the national laws, regulations, rules and other normative documents and company rules and regulations on anti-fraud, anti-bribery and anti-unfair competition, Establish a good professional ethics and code of conduct of integrity, self-discipline, diligence and dedication, effectively prevent and deal with potential compliance risks, and prevent acts damaging the interests of the company and shareholders.

**第四条** 反舞弊、反贿赂及反不正当竞争的合规要求为：公司及人员在从事商业活动的过程中，应坚持专业、透明、诚信、公平的原则，并致力于建立健全反舞弊、反贿赂及反不正当竞争的合规体系，实施和执行有效的管控制度，打击一切损害公司利益和公共利益的舞弊、贿赂及不正当竞争行为。公司及员工均应严格约束各自的经营管理行为和职务行为，确保行为符合以下要求：

**No. 4** The compliance requirements of anti-fraud, anti-bribery and anti-unfair competition are as follows: the company and its personnel should adhere to the principles of professionalism, transparency, integrity and fairness in the process of engaging in business activities, and strive to establish and improve the compliance system of anti-fraud, anti-bribery and anti-unfair competition, implement and implement effective control system, and crack down on all frauds and acts that damage the interests of the company and the public interest Bribery and unfair competition. The company and employees shall strictly restrict their respective operation and management behaviors and job behaviors to ensure that their behaviors meet the following requirements:

(一) 遵守国家有关反舞弊、反贿赂及反不正当竞争的法律法规、规章制度及其他规范性文件；

(1) Abide by national laws, regulations, rules and other normative

documents on anti-fraud, anti-bribery and anti-unfair competition;

(二) 符合高标准的商业道德, 以及行业公认并普遍遵守的职业道德和行为准则;

(2) Comply with high standards of business ethics, as well as professional ethics and codes of conduct recognized and generally observed in the industry;

(三) 禁止为获取不正当的竞争优势, 向国家工作人员、商业伙伴的员工或代表、代理, 以及其他影响交易的人直接或间接地提供贿赂, 或承诺、参与或者授权提供贿赂;

(3) It is prohibited to offer bribes directly or indirectly to national staff, employees or representatives of business partners, agents and other people who affect transactions, or promise, participate in or authorize the provision of bribes in order to obtain unfair competitive advantage;

(四) 禁止直接或间接地索要、获取、同意获取或收受贿赂;

(4) It is prohibited to ask for, obtain, agree to obtain or accept bribes directly or indirectly;

(五) 禁止实施达成贿赂的中介行为, 包括但不限于介绍、交付、或以其他任何方式协助达成贿赂;

(5) It is prohibited to carry out intermediary acts to achieve bribery, including but not limited to introducing, delivering, or assisting in the achievement of bribery in any other way;

(六) 禁止损害公司利益的舞弊行为和其他不正当竞争的行为。

(6) It is prohibited to engage in fraud and other acts of unfair competition that harm the interests of the company.

**第五条** 本制度适用于公司及所属全资子公司、控股子公司。

No.5 This system is applicable to the company and its wholly-owned subsidiaries and holding subsidiaries.

## 第二章 反舞弊、反贿赂及反不正当竞争的概念及形式

### Chapter II Concepts and forms of Anti-fraud, Anti-bribery and Anti-unfair competition

**第六条** 舞弊是指为谋取个人利益而滥用职权或违背职责的行为。损害公司利益的舞弊, 是指公司内、外人员为谋取自身利益, 采用欺骗等违法、违规手段使公司利益、股东利益遭受损害的不正当行为。公司的任何商业活动中, 禁止以下舞弊行为:

No.6 Fraud refers to the abuse of power or breach of duty for personal interests. Fraud that damages the interests of the company refers to the improper behavior of internal and external personnel of the company to damage the interests of the company and shareholders by means of fraud and other illegal and illegal means in order to seek their own interests. In any business activities of the company, the following fraud is prohibited:

(一) 收受贿赂或回扣;

(1) Accepting bribes or kickbacks;

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- (二) 将正常情况下可以使公司获利的交易事项转移给他人或自身;
- (2) Transfer transactions that can make the company profitable under normal circumstances to others or themselves;
- (三) 非法使用公司资产, 贪污、挪用、盗窃公司资产;
- (3) Illegally using the company's assets, embezzling, misappropriating and stealing the company's assets;
- (四) 使公司为虚假的交易事项支付款项或承担债务;
- (4) Make the company pay money or bear debts for false transactions;
- (五) 故意隐瞒、错报交易事项;
- (5) Deliberately concealing or misrepresenting transactions;
- (六) 泄露公司的商业或技术秘密;
- (6) Divulge the company's business or technical secrets;
- (七) 未经授权或者违反授权内容或者授权过期后, 以公司名义为本人或利害关系人进行任何形式的谋利活动;
- (7) Engage in any form of profit-making activities in the name of the company for himself or an interested person without authorization or in violation of the contents of the authorization or after the expiration of the authorization;
- (八) 未经公司审批, 从事与公司有商业竞争的活动;
- (8) Engaging in commercial competition activities with the company without the approval of the company;
- (九) 利用职务便利, 为自己、利害关系人或他人谋取利益;
- (9) Taking advantage of his position to seek benefits for himself, interested parties or others;
- (十) 利用电子商务技术存在的漏洞和缺陷损害公司利益;
- (10) Using the loopholes and defects of e-commerce technology to damage the interests of the company;
- (十一) 违反员工廉洁自律承诺书的行为;
- (11) Violation of the letter of commitment of integrity and self-discipline of employees;
- (十二) 其他损害公司利益的舞弊行为。
- (12) Other fraudulent acts that harm the interests of the company.

**第七条** 贿赂是指以获得商业交易机会为目的, 在交易之外以回扣、促销费、宣传费、劳务费、报销各种费用、提供境内外旅游等各种名义直接或间接提供、承诺、给付、索取或收受现金、有价物或其他利益的一种不正当竞争行为。公司的任何商业活动中, 禁止以下贿赂或反向贿赂行为:

No. 7 Bribery refers to an act of unfair competition in which cash, valuables

or other benefits are offered, promised, paid, demanded or received directly or indirectly in the name of rebates, promotion fees, publicity fees, labor fees, reimbursement of various expenses, provision of domestic and foreign tourism and other names for the purpose of obtaining business transaction opportunities. The following bribery or reverse bribery is prohibited in any business activities of the company:

- (一) 违反规定以附赠形式向对方单位及其有关人员给予现金或物品;
  - (1) Giving cash or articles to the other party's unit and its relevant personnel in the form of supplementary gifts in violation of regulations;
- (二) 以捐赠为名, 通过给予财物获取交易、服务机会、优惠条件或者其他经济利益;
  - (2) In the name of donation, obtain trading, service opportunities, preferential conditions or other economic benefits by giving property;
- (三) 提供违反公平竞争原则的商业赞助或者旅游以及其他活动;
  - (3) Providing commercial sponsorship or tourism and other activities that violate the principle of fair competition;
- (四) 提供各种会员卡、消费卡(券)、购物卡(券)和其他有价证券;
  - (4) Provide various membership cards, consumption cards (coupons), shopping cards (coupons) and other securities;
- (五) 提供房屋、汽车等物品;
  - (5) Provide houses, cars and other items;
- (六) 提供干股或红利;
  - (6) Provide dry shares or dividends;
- (七) 通过赌博, 以及假借促销费、宣传费、广告费、培训费、顾问费、咨询费、技术服务费、科研费等名义给予、收受财物或者其他利益;
  - (7) Give or receive property or other benefits through gambling and in the name of promotion fees, publicity fees, advertising fees, training fees, consulting fees, consulting fees, technical service fees, scientific research fees, etc;
- (八) 其他违反法律、法规的贿赂或接受贿赂行为。
  - (8) Other bribery or acceptance of bribery in violation of laws and regulations.
- (九) 为维护正常商业关系而进行的一般商业宴请及礼赠不属于本条所述贿赂行为。
  - (9) General commercial banquets and gifts for the maintenance of normal commercial relations do not belong to the bribery mentioned in this article.

**第八条** 不正当竞争是指扰乱市场竞争秩序, 损害其他经营者或者消费者的合法权益的行为。公司的任何商业活动中, 禁止以下不正当竞争行为:

**No. 8** Unfair competition refers to acts that disrupt the order of market competition and damage the legitimate rights and interests of other operators or consumers. The following acts of unfair competition are prohibited in any

business activities of the company

(一) 混淆行为, 假借和冒充其他经营者或其商品的名称、商标、质量和产地标志等, 以使人混淆、产生误解的行为。

(1) Confusion behavior refers to the behavior of pretending and pretending to be the name, trademark, quality and origin mark of other operators or their goods, so as to make people confused and misunderstood.

(二) 虚假宣传行为, 利用广告或者其他方法, 对商品的性能、功能、质量、销售状况、用户评价、曾获荣誉等作虚假或引人误解的宣传, 欺骗、误导客户的行为。

(2) False propaganda refers to the act of using advertisements or other methods to make false or misleading publicity on the performance, function, quality, sales status, user evaluation and honors of commodities, so as to deceive and mislead customers.

(三) 侵犯商业秘密行为, 通过不正当手段, 违法获取、披露、使用或者允许他人使用权利人的商业秘密的行为。

(3) The act of infringing trade secrets and illegally obtaining, disclosing, using or allowing others to use the trade secrets of the obligee through improper means.

(四) 诋毁商誉行为, 捏造、散布虚假信息或者误导性信息, 损害竞争对手的商业信誉和商品声誉的行为。诋毁他人商誉可能形成对他人企业、商品或“老板”的负面评价, 从而争夺和扩大自己的市场。

(4) Slandering goodwill, fabricating and spreading false or misleading information, and damaging the business reputation and commodity reputation of competitors. Slandering other people's goodwill may form a negative evaluation of other people's enterprises, goods or "bosses", so as to compete for and expand their own market.

### 第三章 反舞弊、反贿赂及反不正当竞争的职责与分工

#### Chapter III responsibilities and division of labor of Anti-fraud, Anti-bribery and Anti-unfair competition

**第九条** 公司管理层应对舞弊、贿赂及不正当竞争行为的发生承担责任。

**No. 9** The management of the company shall be responsible for the occurrence of fraud, bribery and unfair competition.

**第十条** 总经理办公室负责建立、健全反舞弊、反贿赂及反不正当竞争制度。

**No. 10** The general manager's office is responsible for establishing and improving the anti-fraud, anti-bribery and anti-unfair competition system.

**第十一条** 内审部是公司反舞弊、反贿赂及反不正当竞争工作的领导机构和主要负责机构, 负责公司反舞弊、反贿赂及反不正当竞争行为的指导工作, 对反舞弊、反贿赂及反不正当竞争工作进行持续监督。具体包括:

**No. 11** The internal audit department is the leading organization and main responsible organization of the company's anti-fraud, anti-bribery and anti-unfair competition work, responsible for the guidance of the company's anti-



fraud, anti-bribery and anti-unfair competition behavior, and continuously supervise the anti-fraud, anti-bribery and anti-unfair competition work. Specifically include:

- (一) 受理相关舞弊、贿赂及不正当竞争的举报工作；
  - (1) Accept reports of fraud, bribery and unfair competition;
- (二) 组织案件的调查；
  - (2) Organize the investigation of cases;
- (三) 出具处理意见并向管理层、董事会报告；
  - (3) Issue handling opinions and report to the management and the board of directors;
- (四) 开展反舞弊、反贿赂及反不正当竞争预防宣传活动。
  - (4) Carry out anti-fraud, anti-bribery and anti-unfair competition prevention publicity activities.

**第十二条** 全体员工应该遵守公司行为准则、道德规范及国家、行业所涉及的法律、法规。如发现任何舞弊、贿赂及不正当竞争情况，应通过正当渠道向公司内审部举报。

**No. 12** All employees shall abide by the company's code of conduct, code of ethics and national and industrial laws and regulations. If any fraud, bribery and unfair competition are found, it shall be reported to the internal audit department of the company through proper channels.

#### 第四章 预防与控制

**第十三条** 公司倡导诚信正直的企业文化，营造反舞弊、反贿赂及反不正当竞争的企业文化环境，具体包括（但不限于）如下方式：

**No. 13** The company advocates the corporate culture of honesty and integrity and creates a corporate cultural environment against fraud, bribery and unfair competition, including (but not limited to) the following ways:

- (一) 管理层坚持以身作则，并以实际行动带头遵守法律法规及公司各项制度和规范，建立健全各类制度。
  - (1) The management insists on setting an example, takes the lead in complying with laws and regulations and various systems and norms of the company with practical actions, and establishes and improves various systems.
- (二) 公司的反舞弊、反贿赂及反不正当竞争政策和程序及有关措施应在公司内部以多种形式进行宣传 或培训，确保员工接受有关法律法规、职业道德规范培训。
  - (2) The company's anti-fraud, anti-bribery and anti-unfair competition policies and procedures and relevant measures shall be publicized or trained in various forms within the company to ensure that employees receive training in relevant laws, regulations and professional ethics.
- (三) 鼓励员工在公司日常工作和经营业务中遵纪守法和从事遵守诚信道德的行为，帮助员工正确处理工作中发生的利益冲突、不当利益诱惑。

(3) Encourage employees to abide by the law and discipline and conduct honest and ethical behaviors in the company's daily work and business, and help employees correctly deal with interest conflicts and improper interest temptations in their work.

(四) 将公司反舞弊、反贿赂及反不正当竞争工作制度以适当形式广泛告知与企业直接或间接发生业务关系的利益相关方, 包括外部相关方(客户, 供应商, 监管机构和股东), 向他们传递公司反舞弊、反贿赂及反不正当竞争工作的相关信息及要求。

(4) The company's anti-fraud, anti-bribery and anti-unfair competition work system shall be widely informed in appropriate forms to the stakeholders who have direct or indirect business relations with the enterprise, including external stakeholders (customers, suppliers, regulators and shareholders), and the relevant information and requirements of the company's anti-fraud, anti-bribery and anti-unfair competition work shall be transmitted to them.

(五) 公开披露重大舞弊事件的处理结果, 让广大员工充分认识事件的危害性, 引以为戒。

(5) Publicly disclose the handling results of major fraud events, so that employees can fully understand the harmfulness of the event and take a warning.

(六) 公司鼓励针对不道德行为和非诚信行为进行实名或匿名举报, 并对提供有价值举报线索的人员进行一定奖励。

(6) The company encourages real name or anonymous reporting of unethical and dishonest behaviors, and rewards those who provide valuable reporting clues.

## 第五章 舞弊、贿赂及不正当竞争案件的举报、调查、报告

### Chapter V reporting, investigation and reporting of fraud, bribery and unfair competition cases

**第十四条** 公司鼓励实名或匿名举报, 员工及与公司直接或间接发生业务关系的社会各方可通过举报电话、电子邮箱、信函等各种途径举报公司及其工作人员实际或疑似舞弊、贿赂及不正当竞争案件的信息。

**No. 14** The company encourages real name or anonymous reporting. Employees and social parties with direct or indirect business relations with the company can report the information of actual or suspected fraud, bribery and unfair competition cases of the company and its staff through reporting telephone, e-mail, letter and other channels.

举报电话: 13520809781      电子邮箱: windy.feng@bellenchem.com

Reporting telephone: 13520809781      mail box: windy.feng@bellenchem.com

通信地址: 北京市顺义区林河大街 10 号院 9 号楼

Mailing address: Building 9, courtyard 10, Linhe street, Shunyi District, Beijing

**第十五条** 倘举报人怀疑反舞弊、贿赂及不正当竞争事件涉及高级管理人员, 举报人可将事件直接向任一执行董事汇报。董事会应委派适当人选/部门/成立小组调查事件。

**No. 15** If the informant suspects that the anti fraud, bribery and unfair competition events involve senior managers, the informant can report the events



directly to any executive director. The board of directors shall appoint appropriate person / Department / set up a team to investigate the incident

**第十六条** 公司内审部在组织案件调查时, 需要访谈和查阅财务部、人事行政部、董事会办公室、总经理办公室等相关人员和部门的资料和数据时, 相关人员和部门应予以配合。对相关证明材料, 内审部有权对有关文件、资料、实物等进行复印、复制、现场拍照。

**No. 16** When the internal audit department of the company organizes case investigation and needs to interview and consult the materials and data of relevant personnel and departments such as finance department, personnel administration department, board office and general manager office, relevant personnel and departments shall cooperate. The internal audit department has the right to copy, copy and take photos of relevant documents, materials and physical objects.

**第十七条** 对于实名举报, 内审部调查完成后都需要向举报人反馈调查结果。

**No. 17** For real name reports, the internal audit department needs to feed back the investigation results to the informant after the investigation is completed.

## **第六章 舞弊、贿赂及不正当竞争行为的责任追究、补救措施**

### **Chapter VI accountability and remedial measures for fraud, bribery and unfair competition**

**第十八条** 对相关责任进行追究, 其中包括领导责任和直接责任。

**No. 18** Investigate relevant responsibilities, including leadership responsibility and direct responsibility.

(一) 领导责任是指负有相应领导职权的管理人员在其主管或分管工作范围内因失职、失察导致发生舞弊、贿赂及不正当竞争事件, 造成信息失真、隐瞒损失等应承担的责任。

(1) Leadership responsibility refers to the responsibility that the management personnel with corresponding leadership authority should bear due to dereliction of duty and oversight within their supervisor or work scope, resulting in fraud, bribery and unfair competition, resulting in information distortion and concealment of losses.

(二) 直接责任是指公司管理人员及其相关人员在其职责范围内, 直接操作或参与相关决策, 或授意、指使、强令、纵容、包庇他人舞弊、贿赂及不正当竞争, 以及未履行、未正确履行职责等过失行为, 造成公司财产损失、信息失真、声誉受损等应承担的责任。

(2) Direct responsibility refers to the responsibility that the company's managers and their related personnel should bear for directly operating or participating in relevant decisions within their scope of responsibility, or instructing, instigating, forcing, conniving at and shielding others from fraud, bribery and unfair competition, as well as failing to perform or correctly perform their duties, resulting in the loss of the company's assets, distortion of information, damage to reputation, etc.

**第十九条** 对证实有舞弊、贿赂及不正当竞争行为的员工,公司根据情节轻重、认错和悔改态度、给公司造成损失的大小等因素进行追责;行为触犯法律的,交由司法机关依法处理。

**No. 19** For employees who are proved to have fraud, bribery and unfair competition, the company shall be held accountable according to the seriousness of the circumstances, the attitude of admitting mistakes and repentance, and the amount of losses caused to the company; If the act violates the law, it shall be handled by the judicial organ according to law.

**第二十条** 发生相关案件后,公司应及时采取补救措施,对受影响的业务单位的内部控制要进行评估并改进。

**No. 20** After the occurrence of relevant cases, the company shall take remedial measures in time, and evaluate and improve the internal control of the affected business units.

## 第七章 对举报人员的保护和奖励措施

### Chapter VII Protection and reward measures for whistleblowers

**第二十一条** 受理举报、登记、审批或负责舞弊、贿赂及不正当竞争案件调查处理的所有人员应当忠于职守,保守秘密,严禁向任何部门及个人提供举报人的相关个人资料及举报内容;所办案件与本人或者其近亲属有利害关系的,应当回避。

**No. 21** All personnel who accept the report, register, approve or are responsible for the investigation and handling of fraud, bribery and unfair competition cases shall be loyal to their duties and keep secrets. It is strictly prohibited to provide any department and individual with the relevant personal data and report contents of the informant; If the case handled has an interest in himself or his close relatives, he shall withdraw.

**第二十二条** 举报人认为受理举报的工作人员与被举报人存在有利害关系,可能影响客观、公正处理的,有权向内审部负责人或其上层主管提出回避要求。情况属实的,有关人员必须回避。

**No. 22** If the informant believes that the staff accepting the report has an interest with the informant, which may affect the objective and fair treatment, he has the right to request the head of the internal audit department or his upper supervisor to withdraw. If the situation is true, the relevant personnel must avoid it.

**第二十三条** 举报人由于举报案件受到打击报复的,举报人可向内审部进行投诉。经调查核实,存在打击报复行为的,追究相关人员的责任。

**No. 23** If the informant is retaliated for the reported case, the informant can complain to the internal audit department. After investigation and verification, if retaliation exists, relevant personnel shall be investigated for responsibility.

**第二十四条** 对违规泄露检举信息或对举报人员、调查人员采取打击报复的人员,将予以撤职、解除劳动合同。触犯法律的,移送司法机关依法处理。

No. 24 Those who disclose information against regulations or retaliate against informants and investigators will be dismissed and their labor contracts will be terminated. Those who violate the law shall be transferred to the judicial organ for handling according to law.

**第二十五条** 举报案件经查证属实的，应当对举报人予以适当奖励。

No. 25 If the reported case is verified to be true, the informant shall be appropriately rewarded.

## 第八章 附 则

### Chapter VIII supplementary provisions

**第二十六条** 本制度经董事会审议通过后生效执行。

No. 26 The system shall come into force after being deliberated and approved by the board of directors.

**第二十七条** 本制度由总经理办公室负责解释。

No. 27 The general manager's office is responsible for the interpretation of this system.

**参考文献和相关文件：** 无

References and related documents: None

**附件：** BELLEN-GMNT-FRM-004 反舞弊举报登记表

Attachment: bellen-gmnt-frm-004 Anti-fraud reporting registration form

### 历史版本信息

#### Historical version information

版本号 Version number	生效日期 effective date	修订内容 Revised content	变更原因 Reason for change
01	2020年12月15日		
02	2022年4月1日	增加反贿赂、反不正当竞争	