

Kingdee Group Labor Employment and Ethical Conduct Guidelines

I. Policy Statement

To regulate the labor employment management and ethical conduct of Kingdee International Software Group Company Limited (hereinafter referred to as "the Company" or "Kingdee") and its subsidiaries (hereinafter referred to as "the Group" or "we"), and in compliance with the United Nations Global Compact, the core conventions of the International Labour Organization, and relevant laws, regulations, and policies of the People's Republic of China, we have formulated these "Labor Employment and Ethical Conduct Guidelines" (hereinafter referred to as "the Guidelines"). We are committed to ensuring that the actions of all subsidiaries, employees, partners, and third parties within the Group comply with labor management and ethical conduct standards, as well as legal requirements, through transparent and compliant business operations.

II. Applicability

This policy applies to all employees of the Group (including full-time employees, part-time employees, and temporary workers), consultants, suppliers, service providers, and other partners. We are committed to fostering a transparent, honest, and responsible business environment across all our operating regions.

III. Recruitment and Employment

1. The Group is dedicated to creating a fair, non-discriminatory, and diversified working environment. During employment, we ensure equal opportunities and reject all forms of discrimination and bias. The recruitment and hiring of employees follow principles of fairness, impartiality, and openness, without being influenced by gender, age, ethnicity, race, family status, sexual orientation, religious belief, social origin, nationality, disability, or pregnancy.
2. The Group firmly opposes the employment of child labor and acts of human trafficking. We will comply with all international and national laws and regulations concerning child labor and human trafficking and ensure that there are no illegal instances of child labor or human trafficking within our operations and supply chain.

IV. Employment Norms

1. We are committed to not employing any form of forced labor. We will take strict measures to ensure that all employees work voluntarily, eliminating any form of debt bondage, indentured labor, or other forms of forced labor.
2. We respect employees' rights to freedom of association. The company has established two organizations: a union and the Kingdee Employee Committee. We support all employees in freely forming and participating in unions or other lawful organizations to promote cooperation and communication among employees.
3. We are committed to abiding by international standards and regulations related to occupational health and safety, including but not limited to the "Occupational

Health and Safety Management System Specification (ISO 45001)," and actively participating in or adhering to relevant voluntary projects and collective agreements. We will ensure that all actions and policies meet occupational health and safety requirements.

4. We prohibit any form of harassment in the workplace, including inappropriate language, text, images, and physical behavior, whether sexual or non-sexual in nature. Continued harassment after clear refusal is also considered personal assault. The Group has established clear reporting procedures to address specific incidents of discrimination and harassment, ensuring that complaints are handled in a timely and fair manner. Employees can report issues directly to the audit department, immediate supervisors, the human resources department, or through anonymous complaint channels.

5. We are committed to implementing the principle of equal pay for equal work. Regardless of an employee's gender, age, race, religion, or other factors, we ensure they receive fair and reasonable remuneration for the same positions.

V. Ethical Conduct

1. **Anti-Corruption and Bribery:** Kingdee strictly prohibits any form of corruption and bribery, including directly or indirectly accepting, giving, or promising any improper benefits to obtain business advantages or privileges. Employees at all levels are forbidden from offering, paying, soliciting, or accepting any bribes, kickbacks, gifts, or other benefits to influence business decisions or obtain improper advantages.

2. **Confidentiality:** Employees must strictly maintain the confidentiality of the Group's trade secrets and sensitive information. Any actions that may compromise the company's information security, such as unauthorized use and handling of various software, hardware, documents, accounts, and passwords, leading to the leakage, loss, damage, or theft of confidential information or data, are prohibited.

3. **Conflict of Interest:** Employees should avoid actual or potential conflicts of interest while performing their duties, complying with relevant laws, regulations, and guidelines. Employees must not allow any relationships to interfere with their work responsibilities and business judgment and should not engage in or participate in any activities that conflict with the Group's interests. Any potential conflicts of interest must be reported immediately.

4. **Anti-Monopoly and Anti-Unfair Competition:** We advocate for fair competition and strictly adhere to anti-monopoly and anti-competition laws and regulations across all regions, firmly rejecting any unfair competition practices or monopolistic activities.

5. **Anti-Money Laundering and Insider Trading:** Kingdee and its employees must not engage in any form of money laundering or use insider information to conduct insider trading.

6. **Regulated Charitable Donations:** The company encourages legitimate and compliant charitable activities. All charitable donations and sponsorships must

undergo strict review procedures to ensure they are not used as disguised bribes. All related activities must be transparent and recorded, receiving approval from the company's management.

VI. Whistleblowing

Kingdee encourages knowledgeable individuals to report any violations of the Guidelines. The company will protect the identity of whistleblowers and ensure that reports are investigated impartially and confidentially.

- Whistleblowing Department: Kingdee Audit Department
- Whistleblowing Hotline: 0755-86072602
- Whistleblowing Email: jubao@kingdee.com

VII. Board Endorsement

This Guidelines has received full support from the company's highest decision-making body—the Board of Directors. The Board promises to provide the necessary resources and guidance to ensure the effective implementation and continuous improvement of the policy.