

**目录 List of content**

1 目的和目标 Purpose and goal .....2

2 如何联系我们 How you can reach us.....2

3 方法和责任 Approach and responsibilities .....2

3.1 数据保护、举报者保护和保密 Data protection, informant protection and confidentiality .....2

3.2 被检举方保护 Protection of the accused.....3

3.3 确认 Acknowledgement.....3

3.4 涉及违法事件 Circumstances that indicate a criminal offense .....4

3.5 合规案例的处理截止日期 Processing deadlines for compliance cases.....4

4 文件 Documents .....5

5 记录 Records .....5

6 变更记录 List of changes .....5

## 1 目的和目标 Purpose and goal

本附录的目的是为有意愿举报公司潜在违规行为的人提供指导。具体包括：如何举报、我们如何处理举报信息以及在这种情况下，我们应该如何沟通。

The purpose of this appendix is to provide guidance for those who wish to report potential irregularities in our company, how we deal with these reports, and how we communicate in such cases.

## 2 如何联系我们 How you can reach us

为了获得对公司具有或可能具有重大意义的事件信息，无论是直接雇员还是间接雇员或其他利益相关方都可通过以下几条渠道向当地或全球合规官提供信息：

To obtain information about events that direct or indirect employees, as well as other interested parties, consider or may consider to the company, the following channels exist to report this information to the local or global Compliance Officer:

- 举报者应用程序（见曼盛网站：[www.menshen.com](http://www.menshen.com)）  
WhistleblowerApp (see Menshen website: [www.Menshen.com](http://www.Menshen.com))
- 合规电子邮件地址([compliance@menshen.com](mailto:compliance@menshen.com))  
Compliance email address ([compliance@menshen.com](mailto:compliance@menshen.com))
- 电话（直接打给合规官）  
Telephone (directly to the Compliance Officer)
- 信函（致合规官）  
Letter (to the attention of the Compliance Officer)

我们明确指出，除了上述沟通渠道外，您还可以选择直接联系主管部门。

We expressly point out that, apart from the communicating channels mentioned above, there is the option of contacting the responsible authorities directly.

## 3 方法和责任 Approach and responsibilities

原则上，报告的潜在合规案件由相应地点的合规官员处理。该人员还负责确保所有报告都记录在合规报告中，并提交给曼盛集团的合规官。

In principle, reported potential compliance cases are processed by the Compliance Officer at the respective location. This person is also responsible for ensuring that all cases are recorded in the compliance report and presented to the Compliance Officer of the Menshen Group.

### 3.1 数据保护、举报者保护和保密 Data protection, informant protection and confidentiality

我们的报告渠道确保只有负责接收和处理事件的人员以及支持他们完成任务的人员有权限访问此事件。Our reporting channels ensure that only those responsible for receiving and processing incidents and those who collaborate in their management have access to the relevant information.

合规官需确保以下人员的身份保密：

The Compliance Officer ensures the confidentiality of the identity of the following people:

- 提供信息的人  
the person providing the information

- 造成此事件的主体人员  
the person(s) who are the subject of an incident
- 报告中提到的其他人  
other person(s) named in the report

负责处理相应事件的合规官要确保上述人员的身份仅为他们或负责采取后续措施的人员，以及协助执行这些任务的人员所知。无论合规官是否对即将发生的事件负责，都需遵守身份保密的要求。

The Compliance Officer entrusted with processing an incident is responsible for and ensures that the identity of the aforementioned persons is known only to them or to persons responsible for taking follow-up measures and the persons collaborating with them in carrying out these tasks. The requirement of identity confidentiality applies regardless of whether the Compliance Officer is responsible for the incoming incident.

### 3.2 被检举方保护 Protection of the accused

原则上，受到潜在合规事件牵连和正在被调查的每个人都适用“无罪推定”原则。处理合规案件时，必须确保其个人数据/信息得到保护。此外，接受调查者有权知悉他们被指控的作为或不作为，并有权在任何时候阐述他/她们的意见。

In principle, everyone who is implicated and under investigation of a potential compliance incident is subject to the presumption of innocence. When processing a compliance case, it must be ensured that the protection of personal data is guaranteed. Furthermore, the investigated person has the right to be informed of the actions or omissions with which they are accused and to be heard at any time.

### 3.3 确认 Acknowledgement

如果举报者提供了自己的详细联系方式，他们将收到合规官的反馈，告知已收到举报。此外，随着事件的进展，他们有权知悉调查结果和所采取的措施，同时合规官可在与举报者直接接触过程中向其解释并澄清任何疑问。

If the person providing the information identifies themselves with their contact details, they will receive feedback from the Compliance Officer that the report has been received. Furthermore, they will be informed about the results of the investigation and measures taken as the matter progresses, and the Compliance Officer has the opportunity to clarify any queries that may arise during direct contact processing.

如果举报方式为匿名举报，以上便无法得以实现，除非举报者使用举报应用程序（仅在应用程序中间接使用）。如举报者使用举报应用程序，其可以保存举报编号，当输入举报编号信息时举报应用程序系统会给出相应的注释。举报者可随时在举报应用程序输入举报编号，以了解处理进程或更多的信息。This is not possible for reports that reach us anonymously, except when the whistleblower App been used (in the App only indirectly). If the informant uses the App, they can save the report number. A corresponding note is given when entering the message. This message number can be entered into the App at any time to find out the status of processing or to any further information.

在处理通过举报应用程序收到的事件时，合规官如有任何问题或疑问，可以在举报应用程序中输入并记录这些问题或疑问。但是，无法确定这些问题信息是否已被信息提供者读取，因为该应用程序无法追溯所有输入的问题或疑问信息是否被已读取。

If the Compliance Officer has any questions while processing an incident that have reached us via the App, they can document them in the App. However, it is not possible to determine whether these are read by the information provider, as the App ensures that all entries made cannot be traced back.

如果有关可能的合规事件信息通过未被正式委托处理合规事件的人员传入公司，其程序如下：

If information about a possible compliance incident reaches the company via those who are not officially entrusted with processing compliance incidences, the procedure will be as follows:

合规官告知相关人员，他们有义务对此信息绝对保密。在这方面得到指示的人员必须签署合规官为此对话起草的协议。如果违反了保密协议，将会受到劳动法的制裁。

The Compliance Officer informs the person concerned that they are obliged to maintain absolute secrecy about this information. The person instructed in this regard must sign the protocol drawn up for this conversation by the Compliance Officer. If there is a violation of the instruction to maintain confidentiality, this will have consequences under labor law.

### 3.4 涉及违法事件 Circumstances that indicate a criminal offense

如果在处理合规事宜的过程中，已知的证据达到刑事犯罪的程度，合规官将通知相关的司法机构。

If, during the processing of a compliance matter, evidence emerges and accumulates those points to a criminal offense, the responsible public prosecutor's office will be informed by the Compliance Officer.

### 3.5 合规案例的处理截止日期 Processing deadlines for compliance cases

以下截止日期适用于合规问题的处理。

The following deadlines apply to the processing of compliance issues.

- 合规官必须在收到通知后 7 天内以书面形式向提供信息的个人确认收到通知。  
The Compliance Officer must confirm the receipt of the note in writing to the individual providing the information no later than 7 days after receipt.
- 每个合规案例的调查必须在收到信息后的 15 个自然日内开始。本地合规官负责记录信息接收和调查的开始日期，以及处理该事件的准确时间（如可能）。  
The investigation of each compliance case must be started not later than 15 calendar days after receipt of the information. The local Compliance Officer is responsible for documenting the receipt of the information and the start of the investigation with the date and, if possible, the time of the transaction.
- 每个合规事件必须在三个月内得到解决。复杂情况除外。在这种情况下，处理时间可以再延长三个月。  
Each compliance incident must be addressed within three months. Exceptions can be made in complex cases. In such cases, the processing time can be extended an additional three months.

举报者将在三个月内收到书面反馈回复。反馈包括计划通知和已经采取的措施，以及采取这些措施背后的原因。只有在不影响内部调查或进一步调查，且不侵犯事件当事人或报告中所述人员的权利的情况下，才能向提供信息的个人提供反馈。

The informant will receive written feedback within three months. The feedback includes the notification of planned and already taken measures, as well as the reasons behind them. Feedback to the individual providing

the information may only be given to the extent that this does not affect internal investigations or further investigations and does not violate the rights of the person(s) who are subject of the incident or who are named in the report.

**4 文件 Documents**

- M01\_PI\_03\_Compliance-Management\_INT

**5 记录 Records**

- Compliance Notes

**6 变更记录 List of changes**

Date	Index	Description of the change