

ZTT Compliance Rules on Employees Compliance Training

CHAPTER I. General Provisions

Article 1.

Company ZTT

Applicable Laws

ZTT Compliance Rules

Article 2.

Subsidiaries

Article 3.

Article 4.

Article 5.

Article 6.

1. **Compliance** Applicable Laws, international conventions, Compliance Codes of International Organization, regulatory provisions, industrial standard, business practice, ethics and the rules and regulations by the Company and its Subsidiaries in their regular course of business
2. **Compliance Risks** to the possibility of legal sanctions, administrative penalties, significant loss of property or reputation or other negative impacts that may be incurred by the Company and its Subsidiaries or the Employees as a result of their Noncompliance Conducts.

Article 14.

Article 15.

Article 16.

SECTION III. Onsite Training

Article 17.

Article 18.

Article 19.

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Article 20.

CHAPTER IV. Training of Compliance Officers

Article 21.

Article 22.

CHAPTER V. Follow-up Supervision of Compliance Training

Article 23.

Article 24.

Article 25.

CHAPTER VI. Miscellaneous

Article 26.

Article 27.

Article 28.

Annexes:

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- 2.
- 3.
- 4.

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Annex 2

| Attendees | Course | Frequency |
|----------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All Employees | <ul style="list-style-type: none">• Basic Online Training | <ul style="list-style-type: none">• Current Employees: within 3 months after the launch of the online basic training courses• New Employees: within 30 days of on-board• Follow-up regular compliance training: once every two years |
| Employees with Usual Compliance Risks | <ul style="list-style-type: none">• Advanced Online Training | <ul style="list-style-type: none">• Current Employees: within 3 months after the launch of the online advanced training courses• New Employees: within 30 days of on-board• Follow-up regular compliance training: once every two years |

Annex 3

| Attendees | Course | Frequency |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Compliance Officers | <ul style="list-style-type: none"> • Training for Compliance Officers | <ul style="list-style-type: none"> • All Compliance Officers: before onboarding • Follow-up regular professional compliance training: once per year |
| Key Personnel in Financial Department | <ul style="list-style-type: none"> • Gift & Hospitality Compliance • Donation & Sponsorship Compliance • Cash Payment Compliance | <ul style="list-style-type: none"> • Current Employees: within 6 months after the launch of the on-site training courses • New Employees: to be completed within 6 months after on-board/transfer • Follow-up regular compliance training: once every two years |
| Key Personnel in Market Develop Department | <ul style="list-style-type: none"> • Gift & Hospitality Compliance • Donation & Sponsorship Compliance • Third Party Due Diligence Compliance • Bidding Compliance | <ul style="list-style-type: none"> • Current Employees: within 6 months after the launch of the on-site training courses • New Employees: to be completed within 6 months after on-board/transfer • Follow-up regular compliance training: once every two years |
| Key Personnel in Biddings Department | <ul style="list-style-type: none"> • Gift & Hospitality Compliance • Donation & Sponsorship Compliance • Bidding Compliance | <ul style="list-style-type: none"> • Current Employees: within 6 months after the launch of the on-site training courses • New Employees: to be completed within 6 months after on-board/transfer |

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| | | <ul style="list-style-type: none"> Follow-up regular compliance training: once every two years |
| <p>Key Personnel in Procurement Department</p> | <ul style="list-style-type: none"> Third Party Due Diligence Compliance Procurement Compliance | <ul style="list-style-type: none"> Current Employees: within 6 months after the launch of the on-site training courses New Employees: to be completed within 6 months after on-board/transfer Follow-up regular compliance training: once every two years |
| <p>Key personnel in Project/Labor Subcontract Department</p> | <ul style="list-style-type: none"> Contract Compliance Third Party Due Diligence Compliance | <ul style="list-style-type: none"> Current Employees: within 6 months after the launch of the on-site training courses New Employees: to be completed within 6 months after on-board/transfer Follow-up regular compliance training: once every two years |
| <p>Key Personnel in Human Resources Department</p> | <ul style="list-style-type: none"> Compliance Management Employees Conduct Training Election, Appointment and Management of Compliance Officers | <ul style="list-style-type: none"> Current Employees: within 6 months after the launch of the on-site training courses New Employees: to be completed within 6 months after on-board/transfer Follow-up regular compliance training: once every two years |

