



## Anti-Fraud and Anti-Bribery

Shenzhen Expressway adheres to the business philosophy of integrity and cleanliness. Focusing on responsibility implementation, the Company strengthens the construction of the anti-corruption management system. It reinforces constraints and supervision on the operation of power, urging functional departments to closely integrate anti-corruption risk prevention with their business management. This promotes the integration of anti-corruption risk prevention into various aspects of the Company's production and operation processes.

### I. Compliance Management

Shenzhen Expressway comprehensively strengthens compliance construction, using Shenzhen Expressway Group Co., Ltd. Compliance Manual as the general guideline and the Regulation Management Measures as the basic system. It has issued the Compliance Risk Checklist for 13 Key Business Areas such as Tendering and Procurement and established a compliance management organisational structure with clear responsibilities and coordinated linkage. The Company has established three lines of defense: "Business Department – Risk Management and Legal Affairs Department – Audit Department, Discipline Inspection Department," with strict control at each level, progressing layer by layer to prevent and mitigate potential compliance risks. Through the application of a compliance information system, we embed compliance risk audits into existing business information systems, integrate identified compliance risk points and prevention measures into existing business processes and strengthen real-time management and risk analysis of business operations through dynamic monitoring.

### II. Risk Prevention and Control

Shenzhen Expressway has established a comprehensive risk prevention and control system and mechanism throughout the entire chain, and has constructed a "six-sphere Integrated Plan" supervisory pattern. It actively promotes coordination and integration of various supervisory measures and facilitates the better transformation of institutional advantages into governance effectiveness. The Company diligently conducts annual assessments of major risks and effectively tracks and monitors these risks on a quarterly basis, implementing corresponding measures. The Company focuses on key areas such as production and operation, reform and innovation, industrial investment and risk prevention and control. It strengthens daily supervision and inspections, conducts in-depth research to address issues and proactively prevents and resolves operational risks. During the reporting period, we ensured the integrity and efficiency of major construction projects through comprehensive supervision. Independent third-party professional institutions were hired to conduct full-process audit and actively promote the creation of "sunshine, quality, and integrity" projects.

Focusing on key areas of concentrated authority, capital operation, fund management and out-of-town projects, which involve centralised power, intensive capital and abundant resources, Shenzhen Expressway continues to intensify its supervision efforts. The Company increases control measures for key individuals, key processes and key areas that may pose significant risks of integrity and compliance in operational management activities. There is ongoing enhancement in the manual for preventing and controlling integrity risks.

### **III. Integrity Education**

Shenzhen Expressway adheres to the principles of prioritizing education, prevention and warning in promoting ethical culture. It considers the construction of an ethical culture as a foundational project, continually enhancing the dissemination, impact and penetration of ethical culture. The Company has established a “Ethical Column” in its office system, regularly publishing distinctive columns such as “Legal Articles,” “Disciplinary News,” “Warning Cases,” and “Discipline Highlights” to effectively strengthen awareness of ethical conduct.

### **IV. Integrity Management**

Shenzhen Expressway advocates the concept of integrity and adheres to business ethics. The Company regards integrity as the foundation for its establishment, cultivating a core set of values based on integrity. We deeply instil a sense of integrity in the hearts of all employees to make each employee an executor and defender of business ethics.

The Company respects market rules, abides by the spirit of contracts and maintains a fair competitive environment. We adhere to the “Sunshine Purchase Policy” and have formulated a series of management regulations and systems, including the Procurement Management Procedure, Procurement Operation Rules, Evaluation and Determination Committee Establishment and Management Measures and Tender Supervision Group Establishment and Management Measures. All procurement activities must be publicly disclosed on the Shenzhen Sunshine Procurement Platform.