

ZTT Regulation on Anti-corruption and Anti-bribery

Name	ZTT Regulation on Anti-corruption and Anti-bribery		
No.	ZTTINT-HR-MD-2016(015)(B/0)	Responsible Department	Personnel Department
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1. Purpose

In order to solidly promote the anti-corruption and anti-bribery work of commercial activities, strengthen the internal control mechanism of enterprises, achieve honesty and trustworthiness, and establish the management concept with the core of law-abiding, honesty and high-quality service, the company formulates this regulation in view of its practical situation to strengthen the supervision by regulation, promote the anti-corruption by regulation, and strengthen the supervision and management of the personnel in key links and key departments that are prone to multiple corruption. The company maintains the commitment system of control of commercial bribery, strictly abides by fair competition rules, guides company managers and relevant interest groups (such as customers, suppliers, etc.) to act in accordance with the law, be honest and trustworthy, and consciously resist negative corruption, such as disregarding moral principles in pursuit of profit, injuring public interests to benefit private interests, not being trustworthy, cheating and so on, the ultimate goal of all of which is to foster a good and healthy company image.

2. Introduction

This regulation shall be applicable to economic activities such as recruitment and procurement within the scope of the company, as well as to the management of personnel, finance and property.

3. Terms, definitions and abbreviations

Form 1 Terms, definitions and abbreviations

No.	Term in Chinese	Term in English	Abbreviation	Definition/Comment
/	/	/	/	/

4. Requirements

4.1 Employees should strictly abide by the provisions of the *Law of the People's Republic of China Against Unfair Competition* and *Criminal Law of the People's Republic of China* on prohibiting commercial bribery, adhere to the principles of "abiding by the law, honesty, impartiality and being scientific", and resolutely refuse gifts of commercial bribery and other improper commercial behaviors.

4.2 During their employment, employees shall not accept any gifts from any supplier, partner or contractor in the name of the company or individual by directly and indirectly demanding or accepting money, items, securities and money gifts including but not limited to cash, checks, credit cards, etc.

No part-time job may be held with any supplier, partner, contractor etc. during their employment.

(1) During the employment, it is forbidden to take anything from any supplier, cooperator and contractor for personal gain by taking advantage of the rights granted or for the convenience of work.

(2) During the employment, no subsidies from suppliers, partners, contractors, etc. and no entertainment paid with public funds shall be allowed, the place of which may be business singing halls, dance halls, nightclubs, etc.

(3) During the employment, employees' relatives and friends shall not be arranged or introduced to contract projects or supply materials, finished products, semi-finished products and equipment to the projects fully or partially related to partners and contractors, etc.

4.3 Self-examination and assessment.

4.3.1 As the supervisory and administrative department of the commitment system preventing commercial bribery, the Personnel Department fulfills the following main responsibilities:

(1) to administrate and carry out the corporate governance of commercial bribery in accordance with the relevant policies, laws, rules and regulations of the state.

(2) to fulfill the duty of discipline inspection and supervision in accordance with the law.

(3) to strengthen the supervision over and management of the honesty practice of personnel in important parts and sections.

(4) to implement this system and the *ZIT International Principles of Employees' Code of Conduct*, strengthen the prevention and control of corruption from the source, adhere to administering from both internal cause and external cause, improve the system construction, and make real records of honesty and integrity of the personnel working in important parts and sections.

(5) to be responsible for following up, supervising and inspecting the company's implementation of these measures.

4.3.2 In dealing with commercial bribery, the Personnel Department of the company and other departments should strengthen information communication and cooperation. Each Department of the company should strengthen the management of personnel in important positions, and take the conduct of the *Employee Self-Discipline Form* as an important content of inspection and assessment and an important basis for appointment and dismissal.

4.3.3 The Personnel Department organizes an annual employee self-examination. Employees should follow the system, fill in the attached *Employee Self-Discipline Form* according to their personal performance in the past year, and report on violations of the system or other company policies in a timely manner.

4.3.4 If an employee commits a violation of this system, the company shall have the right to give monthly assessment and penalty according to the seriousness of the violation. If any loss is caused to the company, the company shall have the right to immediately terminate the labor contract relationship with the employee and to require the employee to bear all the losses caused to the company as a result. The suspected crimes shall be transferred to the judicial organs.

5. Description of duties

Table 2 Duties of roles

Role	Duties
All the staff	in accordance with the system, consciously abide by the requirements and regularly conduct self check.
Personnel Department	regularly organizes staff self-examination, and summarizes staff violations of the system.
Each role shall be responsible for the security of the information involved in its duties.	

6. Regulatory reference documents (None)

Appendix

ZTT Employee Self-Discipline Form

Name	Department/ Section	Direct supervisor
<p>Description: The <i>Employee Self-Discipline Form</i> is designed on the basis of full trust in employees. It provides an opportunity for employees to review and check themselves against the standard of evaluation of labor attitude set by the company. Please fill in the form fairly. If you find your own problems in the filling process, please take the initiative to communicate with the supervisor or related personnel. Dare to face up to your own problems and act responsibly to yourself. In the "self-checking column", the words "done" and "didn't violate" refer to doing it in full accordance with the requirements of the standards. If not in full accordance with the requirements of the standards, please fill in the words "need improvement" or "violated" regardless of the degree. For specific actions in the "Behavior Standard Column" that are not involved, fill in "not involved". The <i>Employee Self-Discipline Form</i> is filled in quarterly and filed by the Personnel Department of the company.</p>		
No.	Behavior Standard Column	Self-checking column (Tick the box before the correspondent choice)
1. Basic Code of Conduct: (for all employees)		
1.1	When employed by the company (in the duration of the labor contract), do not hold any part-time or consultant positions outside the company without the company's approval.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.2	While being employed by the company, no speculative activities such as stock speculation or foreign exchange speculation, no arbitrary equity participation or co-operation with others to set up a company.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.3	Refuse any form of rebate by the convenience of work.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.4	Do not add private and unreasonable expenses into the expense reimbursement of the company.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.5	Fulfill economical, reasonable expenditure and never extravagantly waste.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.6	Keep your promise to the company and be loyal to the company.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.7	Be honest, trustworthy and reliable when dealing with business activities and business relationships of the company.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.8	Keep the promise of confidentiality strictly and do not intentionally or unintentionally disclose confidential information of the company.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved

1.9	Consciously abide by the company's information security management regulations, safeguard the company's intellectual property rights, and do not privately exchange or transfer confidential documents of the company.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.10	No private collection and illegal use of confidential company documents by the convenience of work.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.11	Do not divulge personal remuneration or inquire about other employee's remuneration.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.12	When employed by the company, employees are not allowed to express opinions, guarantee or attend activities in the name of the company without approval.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.13	Care for your family members, be responsible for your family, properly handle your family relationship, and avoid vicious family disputes.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.14	Do not participate in any form of gambling.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.15	Do not go to unhealthy places or visit unhealthy websites.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.16	During the service in the company, no arbitrary equity participation or co-operation with others to set up a company.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.17	No embezzlement, no bribery, no obtaining private interests under the guise of serving the company.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.18	Do not make unimportant personal calls during office hours, or do other things irrelevant with work, and do not use company telephones to make personal long distance calls.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.19	Actively report infringement of intellectual property rights of the company or damage to the interests of the company.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.20	Do not use company network resources to engage in activities irrelevant with work.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.21	No gossip, no noise at work.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.22	Do not participate in communication activities beyond business needs proposed by business partners.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.23	Be modest and courteous in front of customers, partners and employees.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.24	Hand in non-cultural gifts received from guests to the company.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.25	In reception work, do not drink excessively, behave impolitely or influence work.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.26	Do not disseminate adverse remarks about the company in any form (internet, media, etc.).	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.27	In foreign affairs, behave appropriately and maintain the image of the country and the company.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved

1.28	Be elegant, graceful and decent. Do not wear sleeveless clothes, vest, miniskirts, slippers or other non-conforming clothes in the office. No weird hair style.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.29	Respect others and observe social morality in public places.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.30	When in a car or an elevator, give priority to guests, ladies and the elderly.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.31	Line up to get on and off the bus.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.32	Be strictly self-disciplined in life style, maintain personal integrity and abide by social moral standards.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.33	Attend a meeting on time, and if you can't attend it, inform the convener in advance. Never leave without any reason before the meeting is over.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.34	In the meeting, do not talk to each other or do things unrelated to the meeting. Set the mobile phone on mute or give it to the Secretary for management in order not to interfere with the meeting.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.35	Treat the cultural differences of customers, suppliers, business partners and employees from all over the world with respect and impartiality. Respect the customs of employees of different nations and nationalities and treat each other with courtesy.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.36	Do not utilize the company's resources or positions for personal gain.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.37	Avoid words, actions or behaviors that may be considered sexual harassment.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.38	Do not hold or use illegal goods or drugs.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.39	Have a sense of social responsibility and devote your love to the society when needed.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
Basic Code of Conduct: (other requirements for managers)		
1.40	Middle and senior cadres do not recommend junior staff (especially relatives and friends) of operation type to be employed.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
1.41	Take the lead in abiding by the company's information security regulations. Do not shield or tolerate employees who violate the information security provisions.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.42	Timely criticism and correction of subordinates' non-compliance with relevant company regulations.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.43	Take the lead in abiding by the company's prohibition of gambling. Correct employees' gambling behavior in a timely manner without protection or toleration. Take the lead in creating a healthy organizational atmosphere.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved

1.44	Respect subordinates. Do not reprimand or scold subordinates or affect their working mood.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.45	Do not appoint relatives, collude with others or promote and recommend subordinates according to personal preferences or dislikes.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
1.46	Comply with Cabinet Principles and do not randomly disseminate sensitive information about team decision-making.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2. Responsibility and professional dedication: (for all employees)		
2.1	Love your own work, keep improving your work, constantly learn and improve your ability to work, and promote work progress.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.2	Have the courage to be responsible, do not shirk responsibility, and take solving problems as the primary task.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.3	Have risk awareness, and courage to innovate, improve and promote work, do not be afraid of making mistakes.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.4	Keep your words and deeds in line and fulfill your promises.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.5	No dereliction of duty, and no repetition of the same mistake.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.6	Dare to adhere to principles and be good at sticking to principles in work.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.7	When circumstances change or you encounter difficulties, timely handle or report to relevant leaders to mitigate losses.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.8	Ignore personal gains or losses and personal grievances. Tell the truth, neither repressing nor concealing the facts.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
Responsibility and professional dedication: (other requirements for managers)		
2.9	Highlight the training of subordinates, teach by example, organize team, and dare to cultivate and recommend people who are stronger than yourselves.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.10	Focus on the company's business needs. Dare to work in hard areas and unfamiliar environments. Constantly challenge and improve yourselves.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.11	With an overall outlook, actively bear responsibility instead of shirking in inter-departmental cooperation.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
2.12	Be not self-centered in work arrangements. Do not bargain for work arrangements out of personal reasons.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3. Team Spirit: (for all employees)		
3.1	Be able to take the work goal as the orientation in the team and dare to take on the difficulties in the work in order to achieve the team goal.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.2	Have the courage to carry out criticism and self-criticism.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.3	Respect the personality of others and do not blame others	<input type="checkbox"/> done <input type="checkbox"/> need improvement

	with insulting language.	<input type="checkbox"/> not involved
3.4	Be open-minded, tolerant, proactive in sharing resources and actively helping others.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.5	Pay attention to internal unity. Do not create contradictions and incidents. Treat other people sincerely.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.6	Actively contribute to building a united and positive team atmosphere.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
Team Spirit: (other requirements for managers)		
3.7	Be impartial and objective in the examination and evaluation of subordinates.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.8	Always be self-disciplined and set a good example for subordinates.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.9	Equitable and effective ideological communication with subordinates.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.10	Adequately and promptly affirm the achievements of subordinates, and do not scramble with subordinates for credit.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.11	Actively learn the advantages of others, including subordinates. Absorb the experience of others, and accept the correct opinions of subordinates.	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
3.12	Do not exclusively emphasize the merits of the Department when appraising bonuses, shares, etc..	<input type="checkbox"/> done <input type="checkbox"/> need improvement <input type="checkbox"/> not involved
4. Fine tradition		
4.1	Maintain hard work and constantly improve professional ability.	<input type="checkbox"/> done <input type="checkbox"/> Basically done <input type="checkbox"/> need improvement
5. Alarm bell ringing		
The following is the company's most basic requirements for employees' integrity. Once the regulations are violated, they will be dismissed or discharged. Serious violations of state laws will be handed over to the judicial authorities.		
5.1	It is strictly forbidden to divulge the company's business secrets.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
5.2	Intentional false reimbursement is strictly prohibited.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
5.3	It is strictly forbidden to engage in business competition with the company.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
5.4	Bribery, acceptance of bribes and kickbacks are strictly prohibited.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
5.5	Do not access unhealthy places.	<input type="checkbox"/> didn't violate <input type="checkbox"/> violated <input type="checkbox"/> not involved
Name of the employee (signature):		Date: ___(month)__(date), ___(year)