

贵州茅台酒股份有限公司

商业道德政策

Kweichow Moutai Co., Ltd.

Business Ethics Policy

贵州茅台酒股份有限公司（以下简称“公司”）严格按照法律法规和道德标准开展生产经营活动，禁止出现任何对公司诚信和声誉产生不良影响的行为。为了做好相关工作，公司采取包括但不限于以下商业道德政策。

Kweichow Moutai Co., Ltd. (hereinafter referred to as “the Company”) strictly conducts its production and business activities in accordance with laws, regulations, and the ethical standards, and prohibits any behavior that may adversely affect the integrity and reputation of the Company. To carry out relevant work effectively, the Company adopts the following business ethics policy, among other relevant policies.

一、适用范围

I. Scope of Application

本政策适用于公司及子公司的所有董事、监事、高级管理人员和全体员工，并积极推动公司商业合作伙伴（如供应商、经销商等）落实相关政策。我们鼓励和支持商业合作伙伴（如供应商、经销商等）坚持诚信合规原则，确立和遵循不低于本政策的行为

标准。

This policy applies to all directors, supervisors, senior management personnel, and all employees of the Company and its subsidiaries. We promote the implementation of this policy by our business partners (such as suppliers, distributors, etc.). And we encourage and support our business partners to adhere to the principles of integrity and compliance, and establish and follow behavior standards no lower than those stipulated in this policy.

二、指导监督机构

II. Guidance and Oversight Unit

本政策涉及的商业道德事项由公司董事会下设的风险与合规管理委员会负责指导监督。

The ethical business matters covered by this policy are reviewed and supervised by the Risk and Compliance Management Committee established under the Board of Directors of the Company.

三、政策内容

III. Content of the Policy

(一) 规范治理

1. Standardized Governance

公司严格按照《公司法》《证券法》《上市公司治理准则》等法律法规和有关公司治理的规范性文件要求,结合公司实际情

况，建立健全公司法人治理结构，规范公司运作。

The Company strictly follows the requirements of relevant laws and regulations such as the *Company Law of the People's Republic of China*, the *Securities Law of the People's Republic of China*, and the *Code of Corporate Governance of Listed Companies*, as well as documents on corporate governance, to establish a sound legal person governance structure tailored to the Company's actual situation, for standardized operations.

（二）依法依规披露信息

2. Legal and Regulatory Disclosure of Information

公司严格按照法律、行政法规等有关规定履行信息披露义务，披露的信息做到真实、准确、完整，不存在虚假记载、误导性陈述或者重大遗漏。

The Company strictly fulfills its obligation to disclose information in strict accordance with relevant laws, administrative regulations, etc. The disclosed information is true, accurate and complete, with no false records, misleading statements, or major omissions.

（三）促进公平竞争

3. Fair Competition Promotion

公司严格遵守维护市场竞争方面的法律法规，禁止任何形式的垄断和不正当竞争行为，促进公平竞争。

The Company strictly complies with laws and regulations concerning the maintenance of market competition, prohibits any form of monopoly and unfair competition, and promotes fair competition.

（四）反商业贿赂和反腐败

4. Anti-bribery and Anti-corruption

公司重视廉洁文化建设，对商业贿赂和腐败“零容忍”。公司强化商业伙伴反商业贿赂和反腐败风险管控，在业务交往中明确反商业贿赂和反腐败声明与要求，禁止发生任何商业贿赂和腐败行为。包含全体供应商在内的商业伙伴须制定反商业贿赂和反腐败政策，并实施相应计划以核实合规情况。

The Company values the efforts to foster a culture of integrity and has a zero-tolerance policy towards commercial bribery and corruption. The Company strengthens the risk control of anti-bribery and anti-corruption for its business partners, by explicitly stating anti-bribery and anti-corruption declarations and requirements in business dealings, and prohibiting any commercial bribery or corrupt behavior. All business partners of the Company, including suppliers, are required to have anti-bribery and anti-corruption policies and implement corresponding programs to verify compliances.

公司定期为全体员工提供反腐败和商业道德标准培训，维护健康、安全、高效的工作环境。

The Company regularly provides anti-corruption and business ethics standards training for all its employees to maintain a healthy, safe, and efficient working environment.

（五）反洗钱

5. Anti-money Laundering

公司禁止参与或协助任何第三方非法洗钱，公司员工也不得从事或协助他人从事非法洗钱活动。

The Company prohibits involvement in or assistance to any third-party illegal money laundering activities, and its employees are also prohibited from engaging in or assisting others in illegal money laundering activities.

（六）禁止内幕交易

6. Prohibition of Insider Trading

公司员工须遵守相关法律法规和上市公司监管要求，内幕信息知情人不得利用内幕信息买卖公司股票，不得泄露内幕信息，不得利用内幕信息建议他人买卖本公司股票，也不能利用内幕信息进行其他非法交易。

The employees of the Company shall comply with relevant laws, regulations, and regulatory requirements for listed companies. People with inside information are not allowed to buy or sell the stocks of the Company using insider information, disclose insider information, advise others to buy or sell the stocks of the Company

using insider information, or engage in other illegal transactions using insider information.

(七) 反舞弊

7. Anti-fraud

公司禁止员工及其他利益相关方出现采用欺骗等违法违规的舞弊行为，损害公司利益。

The Company prohibits its employees and other stakeholders from engaging in fraudulent activities such as deception that violate relevant laws and regulations and harm the interests of the Company.

(八) 回避制度

8. Avoidance System

员工应将公司的利益放在个人利益前面，在遇到利益冲突时，应向上级相关部门进行披露并主动申请回避，并严格遵守回避制度。

Employees of the Company shall prioritize the interests of the Company over personal interests. When faced with conflicts of interest, they should disclose to relevant superior departments and proactively apply for avoidance, and strictly adheres to the avoidance system.

(九) 举报政策及举报人保护

9. Whistleblowing Policy and Whistleblower Protection

公司鼓励对公司员工违反商业道德的行为进行举报，公司将

按照有关规定受理并处置，并依照有关办法保障举报人的权益，严格依法保护每个举报人及其相关信息。

The Company encourages reporting of unethical behavior by its employees and will accept and handle reports in accordance with relevant regulations. The Company will protect the rights and interests of whistleblowers and their relevant information strictly in accordance with the law.

（十）定期审计

10. Regular Audits

公司结合实际需要对所有业务、商业道德标准及政策定期进行审计。

The Company conducts regular audits of all operations as well as business ethics standards and policies.