



北京控股有限公司
BEIJING ENTERPRISES HOLDINGS LIMITED

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CODE OF BUSINESS CONDUCT AND ETHICS

July 2026

GENERAL PROVISIONS

I. Purpose

The *Code of Business Conduct and Ethics of Beijing Enterprises Holdings Limited* (the "Code") sets out the compliance requirements governing the business conduct of Beijing Enterprises Holdings Limited ("BEHL" or the "Company"). It provides clear guidance for business and management activities across the Company and for employees at all levels in the performance of their duties, thereby supporting the Company's mission and vision of becoming a "first-class utilities service provider".

II. Scope of Application

This Code applies to the headquarters of BEHL and its member enterprises, including Beijing Gas Group Company Limited ("Beijing Gas"), Beijing Enterprises Water Group Limited ("BE Water"), Beijing Enterprises Environment Group Limited ("BE Environment"), Beijing Enterprises Holdings Environment Technology Co., Ltd. ("BEHET"¹), EEW Energy from Waste GmbH ("EEW GmbH"), and Beijing Yanjing Brewery Co., Ltd. ("Yanjing Brewery"). The list of member enterprises covered by this Code will be updated from time to time to reflect changes in the organisational structure.

Unless otherwise stated, contractors, suppliers and other business partners of BEHL are expected to be fully aware of the requirements of this Code and to comply with the relevant requirements in good faith and with integrity.

III. Instructions for Use

This Code establishes the fundamental compliance principles and behavioural framework applicable to the Company and its employees and serves as a supporting document within the Company's overall compliance management system. In addition to complying with this Code, all employees must strictly comply with the laws, regulations and regulatory requirements applicable to the jurisdictions where business activities are conducted, as well as the articles of association, internal policies and procedures, specific compliance guidelines, business processes and job responsibilities of the relevant business segments. When conducting business in different jurisdictions, the Company and its employees must comply with and implement the locally applicable laws and regulations.

Where no specific rule applies to a particular situation, employees should exercise prudent judgement in accordance with the core principles of integrity, compliance, fairness and impartiality, and promptly consult the Compliance Management Department. Where laws, regulations, regulatory requirements or internal policies are subsequently updated or impose more stringent requirements, the Company must comply with the then-current and effective requirements.

¹ BE Environment and BEHET are integrated as the solid waste treatment business management platform, referred to as the "Solid Waste Treatment Platform" for short.

IV. Consultation and Whistleblowing Channels

BEHL is committed to providing clear, secure and accessible consultation and whistleblowing channels so that employees know where to seek advice and feel able to speak up when compliance concerns arise. The Company has established institutional arrangements under which employees may consult the Compliance Management Department on matters relating to the Code, compliance policies and other compliance issues, and provides regular training on the use of whistleblowing channels. For whistleblowing, the Company maintains multiple reporting channels² designed to protect whistleblower privacy and ensure that reports are received and handled in a timely manner. BEHL places strong emphasis on whistleblower protection. In accordance with the confidentiality and recusal principles set out in the *Whistleblower Protection System of Beijing Enterprises Holdings Limited*, the Company is expressly committed to keeping whistleblowers' personal information and the content of reports strictly confidential. The Company is committed to establishing and implementing a clear whistleblower protection framework to ensure that employees who make good-faith, fact-based reports are not subjected to unfair treatment as a result of legitimate whistleblowing. Measures include anonymous reporting mechanisms, zero tolerance for retaliation and, where necessary, legal support for whistleblowers. These arrangements are intended to encourage employees to take responsibility when risks or misconduct are identified and to act as guardians of the Company's compliance culture.

For detailed requirements, please refer to the [*Whistleblowing Management System of Beijing Enterprises Holdings Limited*](#), the [*Whistleblower Protection System of Beijing Enterprises Holdings Limited*](#) and other relevant policies and procedures.

V. Handling of Violations

Clear consequences for misconduct are essential to maintaining the seriousness of organisational discipline. Any violation of this Code will be handled by BEHL in accordance with applicable internal rules and policies. In serious cases, the Company may terminate the employment relationship in accordance with applicable employment requirements. Where suspected criminal conduct is involved, the matter will be referred to the judicial authorities in accordance with law.

VI. Training and Commitments

Ongoing training and formal commitments are important means of turning written standards into conscious day-to-day conduct. BEHL institutionalizes compliance training and provides anti-corruption and business ethics training to Directors, management and all employees, while communicating relevant training requirements and policy expectations to key business partners. In addition, the Company enhances compliance awareness and capabilities across the workforce by requiring employees, as appropriate, to sign documents such as the *Integrity and Ethical Conduct Commitment* and the *Compliance Commitment*.

VII. Supplementary Provisions

This Code takes effect on the date of approval by the Board of Directors. The department with primary responsibility for the Code shall organise a review of its content at least once every two years and, taking into account changes to local laws, international conventions and regulatory requirements, revise and improve the Code as appropriate.

² For specific whistleblowing channels, please refer to BEHL's Annual Sustainability Report, which is updated annually.

SPECIFIC PROVISIONS

I. BUSINESS RELATIONS: ACTING AS A RESPONSIBLE BUSINESS OPERATOR

As a cornerstone of BEHL's sustainable development strategy, business relations are not only a reflection of the Company's corporate image, but also a direct expression of its core values and sense of responsibility. The Company is committed to conducting business with integrity and honouring its commitments, building collaborative relationships with business partners on the basis of equality, mutual benefit, compliance and transparency, maintaining constructive interactions with public institutions, and fulfilling its responsibilities to the environment and society.

(1) Relations with Business Partners

BEHL regards integrity in business and fair competition as core principles governing its relationships with customers, suppliers and industry peers. The Company is committed to building transparent, mutually beneficial and win-win business relationships and embedding compliance requirements throughout procurement, sales, marketing and competitive activities. Through sound integrity governance, fair competition and quality management systems, the Company safeguards the lawful rights and interests of its business partners and works with them to maintain a healthy and orderly market environment.

(2) Anti-Bribery and Anti-Corruption

BEHL has “zero tolerance” for corruption in any form. The Company is committed to strict compliance with all applicable anti-bribery and anti-corruption laws and regulations in every jurisdiction in which it operates. This includes not only prohibiting bribes to public officials for the purpose of obtaining business advantage, but also strictly prohibiting the provision of improper benefits to any non-public official in connection with business activities. Any breach may result in serious legal consequences for the Company and the individuals concerned, including, without limitation, fines imposed on the Company and criminal liability for directly responsible supervisors and other directly responsible personnel in accordance with law.



YOU SHOULD

- Strictly comply with the laws and regulations on commercial bribery applicable in the country or region where the business is conducted.
- Deal with business partners and public officials on a fair, impartial and transparent basis, treat business partners consistently, and refuse to offer or accept bribes or participate in any other corrupt conduct.
- Proactively communicate the Company's anti-bribery policies and integrity principles to business partners during cooperation and clearly require them to comply with the Company's anti-corruption standards.
- Promptly report any suspected bribery, corruption or other breach of integrity requirements through the designated whistleblowing email, hotline or other reporting channels.



YOU MUST NOT

- Make any form of “facilitation payment” for the purpose of accelerating or securing routine administrative processes; such payments are treated as disguised bribery.
- Directly or indirectly solicit, offer, provide or accept any form of commercial bribe.
- Offer or accept any gift, hospitality or entertainment that does not comply with Company requirements or that could influence a business decision.
- Disguise bribery as a donation, sponsorship, consultancy fee, commission or other payment.



WHAT SHOULD YOU DO?

While liaising with a local authority during the preliminary approval stage of a project, an official privately tells you that if the Company pays a "project coordination fee" to a third-party company designated by the official, the third party can help accelerate approvals such as the environmental impact assessment and project establishment procedures. What should you do?

- Clearly and immediately reject the improper request, communicate the Company's anti-bribery and integrity requirements, and make it clear that all business dealings must comply with the principles of legality, compliance, openness and transparency.
- Properly preserve all relevant communications and do not enter into any payment arrangement or business relationship with the designated third party without compliance approval, so as to prevent the risk of disguised bribery.
- Promptly and truthfully report the matter to the Company's Discipline Inspection Commission Office or through other official reporting channels, and cooperate with any subsequent review or investigation.



FURTHER REFERENCE

For detailed requirements, please refer to [*the Anti-Bribery and Anti-Corruption System of Beijing Enterprises Holdings Limited*](#), the [*Management Policy of Sustainable Supply Chain of Beijing Enterprises Holdings Limited*](#) and other relevant policies and procedures.

(3) Gifts and Hospitality

BEHL strictly regulates business interactions involving gifts, hospitality, invitations to events or other benefits. Any transfer of benefit that exceeds reasonable and customary business courtesy and is intended to improperly influence a business decision or transaction outcome is strictly prohibited.



YOU SHOULD

- Ensure that all gifts, hospitality or other benefits comply with Company policies and applicable laws and regulations, are reasonable in value, serve a legitimate purpose and do not compromise professional integrity.
- Proactively refuse benefits that are offered repeatedly by the same source.
- Accurately record and retain supporting documentation for all business expenditure, maintain transparent and traceable books and records, and strictly comply with the Company's financial internal control requirements.



YOU MUST NOT

- Offer, promise or provide any benefit to an external party, including gifts, hospitality or opportunities, in exchange for an improper decision or action favourable to BEHL.
- Accept any gift, hospitality or other benefit that may impair objective judgement or result in harm to the Company's interests.



WHAT SHOULD YOU DO?

During the centralised tender for core equipment for a new project, a prospective supplier repeatedly invites you to private meetings under the pretext of technical exchanges and solution refinement. After one meeting, the supplier gives you an expensive, industry-customised premium gift and offers to arrange a fully hosted site visit with high-end accommodation and business entertainment. The supplier also hints that, if awarded the contract, it can provide you with "exclusive conveniences" during subsequent equipment operation and maintenance services. What should you do?

- Immediately refuse the gift and any excessive hospitality arrangements, communicate the Company's anti-bribery and anti-corruption requirements, and make it clear that any improper transfer of benefits may directly affect the supplier's eligibility to participate in the tender.
- Fully preserve all communications and transaction records, do not enter into any payment or business arrangement with the supplier without compliance approval, and ensure that all legitimate business expenditure is handled strictly in accordance with Company policy with complete and traceable supporting documentation. All subsequent communications should take place through formal business channels and procurement procedures, and private invitations from the supplier should be declined.
- Promptly and truthfully report the supplier's repeated private invitations, gifts and improper suggestions to the relevant compliance management function, and cooperate with compliance reviews throughout the procurement process.



FURTHER REFERENCE

For detailed requirements, please refer to the [Anti-Bribery and Anti-Corruption System of Beijing Enterprises Holdings Limited](#), the [Management Policy of Sustainable Supply Chain of Beijing Enterprises Holdings Limited](#) and other relevant policies and procedures.

(4) Donations and Sponsorships

All external donations by BEHL must be made solely for genuine public-interest and charitable purposes and must be motivated by altruistic intent. Sponsorships may generate commercial benefits for the Company, but any such benefit must be lawful, legitimate and consistent with fair market value. The Company has incorporated charitable donations and sponsorships into its budget management framework and strictly applies budget approval and internal decision-making procedures. Any form of quid pro quo is prohibited. Donations or sponsorships must never be perceived or used as consideration for obtaining a commercial benefit.



YOU SHOULD

- Ensure that all donations serve genuine public-interest purposes and are not used as a channel for improper benefit transfers or disguised commercial bribery.
- Ensure that any commercial benefit received by the Company in connection with a sponsorship is lawful, legitimate and consistent with fair market value.
- Ensure that all expenditure and payments are recorded truthfully, accurately and completely in the Company's books and records.



YOU MUST NOT

- Use donations as a means of transferring improper benefits or engaging in disguised commercial bribery.
- Fabricate or conceal expenditure or use false transactions or events to extract Company funds.
- Carry out any donation or sponsorship in the Company's name without prior Company approval.



WHAT SHOULD YOU DO?

During the development of a project in a county-level area, the head of a charitable organisation affiliated with the local industry authority approaches you and asks the Company to transfer funds to the organisation in the name of a "rural public welfare donation", claiming that this could help accelerate administrative approvals for the project. The person also proposes that part of the funds be separately paid to a local private event-management company as a "business event sponsorship fee", for which only an ordinary receipt can be provided, and promises that part of the payment will later be returned to you in the form of stored-value or gift cards. What should you do?

- Immediately reject the proposal and communicate the Company's integrity and compliance requirements for donations and sponsorships. Make clear that all such activities must comply strictly with local laws and regulations, retain a genuine charitable nature and must never be used to obtain improper approval advantages.
- Strictly follow the Company's donation and sponsorship management requirements, complete all internal compliance approval procedures, enter into proper agreements, obtain valid charitable receipts and ensure that all expenditure is recorded truthfully, accurately and completely in the Company's books. Fabricated expenditure or improper extraction of funds is strictly prohibited.
- Truthfully report the matter to the Compliance Management Department. If there are indications that public officials may be involved in the transfer of improper benefits, report the matter simultaneously through the Company's discipline inspection and supervision reporting channels and cooperate with any follow-up review.



FURTHER REFERENCE

For detailed requirements, please refer to the [Anti-Bribery and Anti-Corruption System of Beijing Enterprises Holdings Limited](#) and other relevant policies and procedures.

(5) Anti-monopoly and Fair Competition

BEHL is committed to fair competition and to maintaining a fair and orderly market. The Company prohibits all forms of monopoly agreements, abuse of dominant market position and unlawful implementation of concentrations of undertakings. The Company fulfils all applicable notification obligations in its business activities and prohibits abuse of market dominance through conduct including excessive pricing, below-cost sales without legitimate justification, refusal to deal, exclusive dealing, tying or the imposition of unreasonable trading conditions, and discriminatory treatment. The Company actively cooperates with investigations and supervision by anti-monopoly enforcement authorities.



YOU SHOULD

- Strictly comply with applicable laws and regulations and treat customers, competitors, suppliers and other third parties fairly.
- Promptly consult the Compliance Management Department when competition-law issues are difficult to assess. If conduct may constitute a monopoly violation or there is a risk of an anti-monopoly investigation, report the matter immediately in accordance with the prescribed procedures.



YOU MUST NOT

- Disclose or receive any information that may relate to a competitor's confidential business conduct or trade secrets, whether the information directly or indirectly concerns the competitor's current or future business activities.
- Directly or indirectly engage with suppliers, customers or other business partners in any discussion or contact that may improperly restrain trade or exclude or restrict competitors.
- Seek a competitive advantage through dishonest means such as manipulating data, concealing material facts or misrepresenting key information.
- Engage in bid rigging, exclude or restrict potential bidders, or use a position of advantage or administrative power to engage in unfair competition.



WHAT SHOULD YOU DO?

As a marketing employee of Beijing Gas, you attend a closed-door market development seminar organised by a gas industry association. During a break, representatives of several industry peers gather privately and begin discussing non-public commercial information, including planned adjustments to residential gas tariffs and minimum gas supply prices for major industrial customers. Someone proposes that the companies agree on development boundaries for gas infrastructure in new districts and avoid entering one another's established operating areas. Another participant produces a leading competitor's unpublished annual customer acquisition plan and internal cost model for circulation within the group. What should you do?

- Clearly express your objection and stop the discussion of competitively sensitive topics. Communicate the Company's fair competition requirements and make it clear that the Company will not participate in any restrictive communication involving price coordination or market allocation, nor will it receive or circulate any competitor trade secrets.
- If the improper discussion continues, leave the gathering immediately and do not access or obtain any confidential business material. Retain records of your attendance and, where appropriate, ask the industry association to record in the formal meeting minutes that you did not participate in the improper discussion.
- After the event, truthfully report the matter to the relevant Company leader and the Compliance Management Department and cooperate with any compliance risk assessment and record-keeping requirements.



FURTHER REFERENCE

For detailed requirements, please refer to the *Notice of Beijing Enterprises Group Company Limited on Further Strengthening Antitrust Compliance Management*, the *Compliance Guidelines for Investment Management of Beijing Enterprises Holdings Limited* and other relevant policies and procedures.

(6) Interactions with Public Institutions

BEHL recognizes that proper and compliant engagement not only helps preserve a fair market environment but is also a sound foundation for sustainable corporate development. As a company listed on the Stock Exchange of Hong Kong Limited (SEHK), BEHL regards legality, compliance, integrity and transparency as fundamental principles in its dealings with public institutions, including government bodies, regulators and financial institutions.

All interactions must take place within the applicable legal framework and ethical standards. It is strictly prohibited to improperly influence governmental decision-making processes or legislative processes in any form for the purpose of obtaining a business advantage, or to influence government bodies or decision-makers through dishonest means.



YOU SHOULD

- Strictly comply with all applicable laws and regulations.
- When engaging with government bodies or other public institutions in the Company's name, adhere to the principles of openness, accountability and transparency.



YOU MUST NOT

- Use political contributions to influence decision-makers or government legislation or decisions.
- Improperly influence governmental decision-making processes or legislative processes in any form for the purpose of obtaining a business advantage.
- Make any political contribution in the Company's name without Company authorisation.

(7) Anti-Money Laundering and Prevention of Insider Trading

BEHL strictly complies with applicable anti-money laundering and insider-trading laws and regulations and regards financial compliance as a key pillar of corporate governance. In relation to securities dealing, the Company prohibits the use or disclosure of inside information when trading in shares or other securities or financial instruments and strictly controls the number of people with access to inside information. Employees and third parties acting in the Company's name are strictly prohibited from engaging in, participating in or assisting any form of insider trading.



YOU SHOULD

- Be familiar with the Company's rules and criteria for identifying and managing inside information. Where you are unable to determine whether information constitutes inside information, promptly seek guidance from the relevant management function.
- Once you become aware of inside information, ensure during the relevant restricted or sensitive period that it is not disclosed to any unrelated person or organisation.
- Promptly report any suspected insider dealing to the Compliance Management Department and the function responsible for inside-information management.
- Understand and comply with applicable anti-money laundering laws and regulations in the jurisdictions where the Company operates, conduct necessary counterparty due diligence and identity verification, and remain alert to funds of unclear origin and unusual transaction structures and report them promptly.



YOU MUST NOT

- Engage in, participate in or assist any form of insider trading.
- Use, disclose or communicate inside information obtained through your position without express Company authorisation.
- Directly or indirectly buy or sell relevant securities or financial instruments while in possession of inside information.
- Expressly or implicitly encourage another person to trade in securities or financial instruments on the basis of inside information.
- Trade in securities using unpublished material information concerning BEHL's subsidiaries, associated companies or material investment projects.
- Participate in, assist or knowingly permit any form of money laundering, or conduct business with a counterparty that refuses to provide required identity information.



WHAT SHOULD YOU DO?

As an employee of BE Water, you are involved throughout a major investment project under which the Company proposes to acquire water-operation assets in a key region. The transaction has not yet been publicly disclosed and is within the sensitive period for inside information. At a private dinner following an industry event, a securities analyst you know asks you to share the project's core operating assumptions and financial model, promises to use the information only for internal research, and states that the information will be used to adjust the analyst's personal holdings in relevant listed companies. What should you do?

- Clearly refuse the request and disclose no unpublished information about the project. Inform the analyst that the matter constitutes inside information of the Company and that strict confidentiality during the sensitive period is a fundamental compliance requirement; the information must not be used for any unauthorised purpose.
- Strictly comply with the Company's inside-information management requirements. Until the information is formally disclosed, do not discuss project details with any unrelated person and do not hint at or recommend any trading action based on the information.
- After the event, report the matter to the Compliance Management Department and the function responsible for inside-information management, and maintain confidentiality throughout the entire project lifecycle.



FURTHER REFERENCE

For detailed requirements, please refer to the *Inside Information Management Measures of Beijing Enterprises Holdings Limited*, the *Interim Measures for Information Disclosure of Beijing Enterprises Holdings Limited* and other relevant policies and procedures.

(8) Compliant Operations and Transparent Engagement

BEHL strictly complies with applicable domestic and overseas laws and regulations and the regulatory requirements applicable to listed companies. In all external interactions, the Company adheres to the principles of transparency and integrity. It maintains communication with governments and regulatory authorities, opposes commercial bribery and ensures compliance with corporate governance requirements for listed companies.



YOU SHOULD

- Conduct business within the framework of applicable laws and capital-market regulations and ensure compliance with corporate governance requirements for listed companies.
- Maintain transparent communication with governments and regulators, and provide information truthfully.
- Release information externally only through Company-designated functions and channels, ensuring that disclosures are true, accurate and complete.



YOU MUST NOT

- Influence government bodies or decision-makers through any dishonest means.
- Accept media interviews or publish Company-related information on social media without Company permission.

II. OWN OPERATIONS: ACTING AS A RESPONSIBLE MANAGER

BEHL is committed to lawful and compliant operations and to acting as a responsible manager. We regard our employees as our most valuable asset and are committed to providing well-defined career development pathways, comprehensive protection of employee rights and interests, and a safe and healthy working environment, thereby enabling employees to realise their potential and strengthening their sense of belonging. At the same time, we pursue lean management to safeguard, preserve the value of and efficiently utilise state-owned assets. Through sound governance systems and robust safeguards, we also ensure the compliant and secure use of data and information and maintain high-quality corporate disclosure in support of sustainable development.

(1) Avoiding Conflicts of Interest

BEHL respects employees' legitimate personal rights and interests while requiring that personal interests must never interfere with professional judgement or the proper performance of duties. A conflict of interest arises where an employee's personal interests affect the objective performance of his or her duties, or where an employee uses his or her position to obtain an improper benefit. Employees must maintain a clear distinction between personal affairs and the interests of the Company. Even where a conflict is only potential or may reasonably be perceived to exist, employees must proactively disclose the circumstances and take appropriate recusal measures in order to preserve the independence and impartiality of decision-making.



YOU SHOULD

- Give priority to the Company's legitimate interests when making business decisions and avoid conflicts of interest.
- Maintain a strict distinction between personal interests and the interests of the Company, and never use your position to unlawfully transfer Company interests to any other enterprise or individual.
- Where you are unsure whether a conflict of interest exists, promptly consult the relevant department.



YOU MUST NOT

- Use your position to unlawfully transfer Company interests to another enterprise or individual, or use Company assets to engage in activities that compete with the Company.
- Use your position or the Company's market status to engage in conduct that excludes or restricts competition, including unfair pricing, refusal to deal, exclusive dealing or the imposition of unreasonable trading conditions.



WHAT SHOULD YOU DO?

You are responsible for distributor selection, business-partner onboarding and channel management for Yanjing Brewery in a particular region. A relative or close acquaintance plans to enter the local beer distribution business and privately asks you to use your position to relax the Company's onboarding requirements, give preferential access to channel resources, bypass routine performance requirements and help secure an exclusive commercial advantage. What should you do?

- Clearly refuse the request, avoid any personal-benefit opportunity arising from your position, maintain a firm boundary between personal interests and Company business, and place the Company's legitimate interests first.
- Strictly follow applicable business rules. Do not use your authority to provide commercial advantages to relatives or personal connections, improperly favour them in the allocation of channel resources, or relax established cooperation standards.
- Comply with the Company's conflict-of-interest disclosure requirements, accept appropriate oversight and, where necessary, request reassignment or recusal from the relevant duties.

(2) Human Rights and Inclusion

BEHL respects the dignity and personal rights of every employee and is committed to fostering an equal, inclusive, harmonious and supportive working environment. The Company prohibits all forms of insult, discrimination and harassment. It firmly opposes human trafficking and other criminal conduct, ensures that employees work voluntarily and within lawful and reasonable working hours, and prohibits all forms of forced labour. The Company adheres to the principle of voluntary employment and strictly prohibits the use of child labour at any stage or location of its operations. BEHL seeks to foster a diverse, harmonious and inclusive workplace and applies zero tolerance to discrimination or harassment based on personal characteristics throughout the employment lifecycle.



YOU SHOULD

- Understand and uphold the Company's culture and values, and perform your duties diligently in your role.
- Respect the ethnic customs and religious beliefs of others and their personal rights, including rights relating to bodily integrity, reputation and privacy.
- Refrain from discriminatory conduct or inappropriate remarks based on race, colour, nationality, gender, age, disability, pregnancy, belief or other personal characteristics.
- Proactively report conduct that violates the Company's human resources management requirements.



YOU MUST NOT

- Participate in forced labour or any disguised form of forced labour.
- Engage in discrimination in recruitment, appointment, job assignment, remuneration or other employment processes.
- Insult, coerce, verbally abuse, verbally harass or physically harass another person.
- Spread, publish or participate in commenting on false information or statements in the workplace that may harm another person.



WHAT SHOULD YOU DO?

You manage a construction team at a municipal solid-waste incineration power plant operated by BE Environment. One member of the team belongs to an ethnic minority. Other colleagues frequently make jokes about the employee's ethnic customs. Although the employee appears outwardly unconcerned, you notice that the employee has become subdued and distressed. What should you do?

- Promptly stop the inappropriate words and conduct and explain that respect for the ethnic customs of others is a basic Company requirement.
- Proactively speak with the employee, understand how the employee genuinely feels, and communicate the Company's care and support.
- Conduct anti-discrimination education within the team and clearly communicate the Company's zero-tolerance approach to discriminatory conduct.



FURTHER REFERENCE

For detailed requirements, please refer to the [*Management Policy of Workers' Rights and Interests of Beijing Enterprises Holdings Limited*](#) and other relevant policies and procedures.

(3) Health and Safety

BEHL consistently follows the safety principle of “Safety First, Prevention-focused and Integrated Governance” across all domestic and overseas business segments. The Company strictly complies with applicable occupational safety standards in the countries and regions where it operates, maintains appropriate investment in safety and continuously optimises the allocation of relevant resources. In doing so, it continuously improves its occupational health and safety management system, prevents safety incidents and protects the health and safety of employees to the greatest extent possible. The Company also manages waste generated from construction, production and office activities in a regulated manner, including appropriate classification and recycling, and provides occupational-disease protective equipment that meets applicable occupational safety standards in the relevant jurisdictions so as to prevent, control and eliminate occupational health hazards.



YOU SHOULD

- Fully understand the safety, health and environmental risks that may arise during your work, particularly risks associated with toxic gases, chemical reagents and other hazardous substances, and take appropriate personal protective measures.
- Actively participate in and complete all occupational health and safety training provided by the Company and continuously improve your ability to use personal protective equipment and respond to emergencies.
- In the event of an emergency or accident, report it immediately and take appropriate emergency action, always placing human life and safety first.
- Promptly report work-safety risks, hazards and incidents and actively cooperate with work-safety supervision and inspections.



YOU MUST NOT

- Carry out work in breach of the Company's safety management requirements.
- Undertake hazardous work where operating conditions are not adequate, identified hazards have not been rectified, or required safety safeguards are not in place.
- Delay, omit, falsify or conceal the reporting of safety hazards.



WHAT SHOULD YOU DO?

As a production and operations and maintenance employee at a municipal solid-waste incineration power plant operated by BE Environment, you need to enter the anaerobic reactor area of the leachate treatment station to carry out valve maintenance. To shorten the maintenance period, the on-site team leader asks you to skip testing the concentration of hazardous gases inside the vessel and to enter the confined space without a full respirator and chemical-protective equipment, stating that “this is how we always do it and nothing will happen”. You also discover from monitoring records that the area's hazardous-gas monitoring equipment has been out of service for several days, and the team leader instructs you to conceal the failure and not report it to the safety management function so as to avoid affecting the team's performance assessment. What should you do?

- Clearly refuse the non-compliant work instruction. Strictly follow the Company's safety requirements and confined-space work procedures, and do not begin work until hazardous-gas testing confirms safe conditions and all required personal protective equipment is properly worn.
- Fully document the identified safety hazards and strictly follow hazard-reporting requirements. Do not delay, omit or conceal the failure of monitoring equipment. Report the matter truthfully to the Company's safety management function immediately and suspend high-risk work in the affected area until the hazard has been rectified.
- Proactively complete the Company's specialised occupational health and safety training, develop proficiency in protection against toxic and hazardous gases and emergency response for confined spaces, and routinely identify environmental and health risks and implement all required safeguards.



FURTHER REFERENCE

For detailed requirements, please refer to the [*Policy of Health, Safety and Environment of Beijing Enterprises Holdings Limited*](#), the HSE Management System Manual of Beijing Enterprises Holdings Limited and other relevant policies and procedures.

(4) Growth and Development

BEHL is committed to fostering a corporate culture in which the Company and its employees progress together. The Company has established a comprehensive career development system and clear promotion pathways to help employees strengthen their professional capabilities and career competitiveness and achieve shared growth with BEHL.



YOU SHOULD

- Develop a thorough understanding of the Company's career development pathways and promotion mechanisms and perform your work proactively in line with your own development aspirations.
- Complete all Company-required training and vocational skills courses and pursue mutual growth with the Company.



YOU MUST NOT

- Deliberately neglect your duties, perform work perfunctorily, or fail to attend or properly complete Company-required training courses.
- Falsify information or misstate performance in performance appraisals.



WHAT SHOULD YOU DO?

As a technical employee in the pipeline operations department of a Beijing Gas branch, you are required to attend the Company's annual mandatory vocational-skills training on the smart gas inspection system. At the same time, the Company has revised the career development pathway and promotion assessment framework for the technical job family. A colleague in your team has not carefully reviewed the promotion rules or remuneration calculation standards but, based solely on personal impressions, concludes that pay is not commensurate with individual effort. The colleague repeatedly encourages you to miss the specialised training without justification and proposes deliberately slowing routine pipeline inspections and hazard rectification work in order to pressure the Company into changing remuneration. What should you do?

- Clearly reject the colleague's improper proposal, explain the Company's career development pathway and promotion mechanisms, and firmly oppose deliberate work slowdown or neglect of duties.
- Strictly comply with the Company's training management requirements, complete the prescribed vocational courses and training tasks, and perform your duties conscientiously in line with your development aspirations so that both you and the Company can grow through practice.
- Encourage the colleague to raise legitimate concerns through formal human resources communication channels. If the colleague continues to miss required training without justification, deliberately slows work or otherwise breaches management requirements, truthfully report the matter to the relevant manager or Human Resources Department.



FURTHER REFERENCE

For detailed requirements, please refer to the [*Management Policy of Workers' Rights and Interests of Beijing Enterprises Holdings Limited*](#) and other relevant policies and procedures.

(5) Communication and Employee Care

BEHL places great importance on communication with employees, listens to employee views and seeks to provide appropriate care and support so that employees can work with fewer concerns in a positive and supportive environment. In accordance with applicable law, the Company respects and protects employees' lawful rights to participate in or form associations, join trade unions, participate in employee representative congresses and engage in collective bargaining. The Company regularly conducts employee satisfaction surveys covering corporate management, working conditions, teamwork, employee training, performance and benefits, and remuneration and protection. It takes improvement measures in response to survey findings, strengthens the functions of labour mediation committees, maintains reporting channels and strictly observes confidentiality when handling employee enquiries, complaints or requests for assistance while respecting whistleblower rights. The Company also complies with applicable local laws and regulations, makes required social-insurance contributions for employees and maintains employee benefit programmes covering all employees.



YOU SHOULD

- Understand and actively participate in training on the Company's various communication channels and become familiar with how to use them so that you can effectively participate in the Company's employee engagement and decision-making processes.
- Promptly raise a complaint or report through the Company's reporting channels if you experience unlawful discrimination, harassment, defamation or similar conduct.
- Promptly communicate recurring or common issues identified through employee engagement so as to support improvements in Company services and processes.



YOU MUST NOT

- Shield or conceal employees who have engaged in unlawful conduct.
- Use communication channels to spread false information or make malicious complaints.
- Discriminate against, disadvantage or retaliate against another person because that person has made a legitimate report.



WHAT SHOULD YOU DO?

You are an employee representative organising an employee consultation and engagement activity. During the activity, an employee privately tells you that the head of the employee's department has for an extended period subjected the employee to verbal harassment and discrimination based on regional origin. The department head later learns that a complaint has been raised and privately asks you to disclose the complainant's identity and specific concerns in advance. What should you do?

- Receive the employee's concerns appropriately, clearly explain the Company's formal channels for protecting employee rights, commit to safeguarding the employee's personal information and complaint details, and support the employee in communicating concerns and protecting legitimate rights through fair, open and formal channels.
- Refuse the department head's request to obtain complaint information and do not disclose any employee personal information or details of the complaint.
- In accordance with the rules governing the Company's employee communication channels, report the concerns truthfully through compliant procedures to the Company's trade union and Human Resources Department, cooperate with subsequent review and fulfil your employee-representative responsibilities in accordance with applicable requirements.



FURTHER REFERENCE

For detailed requirements, please refer to the [*Management Policy of Workers' Rights and Interests of Beijing Enterprises Holdings Limited*](#), the [*Whistleblower Protection System of Beijing Enterprises Holdings Limited*](#), the [*Whistleblowing Management System of Beijing Enterprises Holdings Limited*](#) and other relevant policies and procedures.

(6) Asset Protection

Company assets are fundamental to the operation and development of BEHL. Employees are required to protect Company assets, remain alert to and promptly report conduct that may damage or misappropriate those assets, prevent the loss of state-owned assets, and ensure that Company assets and resources are appropriately used and accounted for.



YOU SHOULD

- Fully understand the intended purpose and permitted use of Company assets and take effective protective measures to prevent the loss or misuse of assets, including tangible property, intellectual property and sensitive information.
- When creating new technologies or products in the course of your work, promptly assess whether they can be protected and proactively secure protection, including through appropriate intellectual-property registrations, so that they become protected Company assets.
- If you identify conduct that may infringe or jeopardise Company assets, immediately report it to your supervisor or the relevant department and proactively take appropriate measures.
- Respect the intellectual property rights of others and avoid infringement. Obtain written authorisation before using third-party intellectual property and use it only within the authorised scope.



YOU MUST NOT

- Misappropriate, embezzle or dispose of Company assets without authorisation.
- Intentionally damage, destroy or waste Company assets.
- Use Company assets for unlawful purposes or for personal purposes without authorisation.
- Obtain, use, copy, alter or destroy Company intellectual property without authorisation.
- Use or disclose Company intellectual property or proprietary information without authorisation after leaving the Company.



WHAT SHOULD YOU DO?

You are responsible for maintenance of incineration power-generation equipment at BE Environment. The Company has recently retired a batch of old equipment and is preparing to dispose of it through established procedures. A colleague suggests removing some parts from the equipment and selling them privately, arguing that the Company no longer uses the equipment. What should you do?

- Even retired equipment remains Company property and must be disposed of through the Company's internal asset-management procedures.
- Privately disposing of Company assets is a violation. Clearly refuse the colleague's proposal.
- If the colleague ignores the warning and removes equipment parts without authorisation, report the matter to your supervisor and the relevant departments.

(7) Confidentiality and Data Protection

BEHL's data and information encompass all electronic and non-electronic information relating to Company operations, including but not limited to strategic plans, financial forecasts, customer information and technical materials. They also include relevant information relating to, or provided by, external parties that conduct business with BEHL, such as customers, suppliers and business partners.

BEHL attaches great importance to data and information protection and requires relevant stakeholders to handle personal data and corporate data relating to customers, employees and business partners appropriately. Particular controls apply across the lifecycle of data collection, storage, use, sharing, transfer, transmission, disclosure and deletion, in accordance with the principles of lawfulness, legitimacy, necessity and good faith. When conducting business in overseas jurisdictions, including the European Union, the Company strictly complies with applicable local data-protection laws and regulations, including the General Data Protection Regulation (GDPR). Where cross-border data transfers are involved, the Company will complete legally required assessments, certifications, standard contractual clauses or other compliance procedures.



YOU SHOULD

- If authorised to access or manage data, implement appropriate security safeguards, including access controls, encryption and the principle of least privilege, to prevent accidental disclosure, misuse or use that could harm the Company's interests or reputation.
- Collect and store employee personal information only for lawful management purposes. Do not unlawfully disclose such information or infringe employee privacy through measures such as monitoring conversations or communications or privately opening correspondence.
- Promptly report cybersecurity incidents and data breaches and take necessary emergency response measures.



YOU MUST NOT

- Unless otherwise required by law, disclose confidential or sensitive Company information to any person outside the normal scope of Company business without prior approval from your supervisor.
- Steal, disclose, alter or provide to another person any personal data collected by the Company.
- Download or transfer sensitive personal or Company data to personal mobile storage or data-transfer devices without authorisation.
- Use sensitive information available to you to obtain an improper benefit for yourself or a third party.



WHAT SHOULD YOU DO?

You are responsible for the customer service system at Beijing Gas and have access to large volumes of residential customer personal information, including names, addresses and telephone numbers. A local marketing company offers a high price to purchase the customer information for targeted marketing. What should you do?

- Customer personal information is protected by law. Selling it without customer consent is unlawful and may constitute a criminal offence involving infringement of citizens' personal information.
- Clearly refuse the proposal and inform the marketing company that the Company strictly complies with applicable laws and regulations on personal information protection.
- If the marketing company repeatedly pressures you or uses improper means, promptly report the matter to the Compliance Management Department and Information Security Department.
- In your day-to-day work, strengthen access controls over customer data and ensure that sensitive data are accessible only to authorised personnel.

(8) Financial Integrity, Accurate Books and Records, and Tax Compliance

BEHL strictly complies with the laws, regulations and accounting standards applicable in the jurisdictions where it operates. The Company strengthens the foundation of financial compliance, ensures that accounting books and records are true and complete and that tax filings are made in accordance with law, and strictly prohibits all forms of financial fraud, falsification of books and records and tax non-compliance.



YOU SHOULD

- Strictly comply with applicable laws, regulations and accounting standards and ensure that accounting records and financial reports faithfully reflect the Company's actual operations and the substance of transactions. Do not conceal, fabricate or distort transactions.
- Fulfil tax filing and payment obligations in accordance with law, ensure that tax-related information is true, accurate and complete, and cooperate with lawful tax inspections.
- Ensure that all books, accounts and supporting documents accurately reflect the underlying transaction. If you discover or reasonably suspect financial fraud, false reporting, misappropriation or fraudulent extraction of funds, report the matter immediately to your supervisor or the Compliance Management Department.
- Manage financial information appropriately, strictly control access to financial data and do not provide unpublished financial information externally without authorisation.



YOU MUST NOT

- Conceal, forge or alter financial records, or fabricate, provide or disclose false financial reports or related information.
- Issue, trade, provide or accept false invoices.
- Maintain unauthorised "off-book funds" or separate off-book accounts, or otherwise conceal or transfer Company assets or operating results.



WHAT SHOULD YOU DO?

As the finance manager of a BEHL subsidiary, during the quarterly close you discover that certain engineering service contracts submitted by the business department recognise revenue prematurely even though the corresponding costs have not yet been incurred. In addition, a long-standing supplier privately asks about the Company's expected results for the next quarter and suggests that it "can help with the books". What should you do?

- Reject the supplier's improper request and make clear that financial records must strictly comply with applicable accounting standards and reflect the substance of transactions. Revenue must not be recognised prematurely and the Company must not participate in any form of earnings manipulation. Suspend the accounting treatment of questionable contracts and require the business department to provide evidence of performance and appropriate cost-matching support so that the financial statements remain true, accurate and complete.
- If further internal review confirms indications of systematic revenue overstatement, concealment of costs or other fraud, immediately report the matter to the Company's responsible financial officer and the Finance, Internal Audit and Compliance Management functions. Preserve relevant contracts, vouchers, supporting documents and communications as evidence, cooperate with any subsequent investigation and take steps to prevent the financial misconduct from continuing.

III. SOCIAL RESPONSIBILITY: PUTTING SUSTAINABILITY INTO PRACTICE

As a leading integrated utilities service provider in China, BEHL has long embraced the green-development principle that “a sound environment underpins people's well-being; green mountains are a source of beauty; and blue skies bring happiness”. The Company integrates sustainability into its day-to-day operations and management and seeks to create long-term, shared value for society and the environment.

(1) Environmental Policy and Governance

BEHL strictly complies with environmental protection laws and regulations in the jurisdictions where it operates and embeds environmental responsibility into corporate strategy and daily operations. The Company has established and maintains an effective environmental management system. The Board approves environmental policies and oversees their implementation, while management is responsible for execution. Each member enterprise develops its own environmental management mechanisms in accordance with the *HSE Management System Manual of Beijing Enterprises Holdings Limited* and is subject to the unified oversight, guidance and assessment of the BEHL HSE Management Committee.

The Company continues to monitor developments in ecological protection, pollution prevention and control, carbon reduction and other emerging environmental areas, and actively collaborates with professional institutions, industry partners and research organisations to strengthen environmental governance capabilities. Through environmental education and training, stakeholder engagement and other measures, BEHL promotes green operations across the workforce and the value chain and seeks to balance business development with ecological responsibility.



YOU SHOULD

- Strictly comply with the environmental laws and standards applicable in the countries and regions where you work and protect the environment.
- Promote paperless office practices and prioritise electronic processes; reuse office supplies where practicable, sort office waste in accordance with applicable requirements, and reduce consumption of single-use items.
- Actively participate in environmental public-welfare initiatives and support energy conservation, emissions reduction, ecological restoration and other green initiatives through practical action.
- Follow the Company's HSE management system requirements, participate in environmental training and report environmental risks or abnormal emissions as required.



YOU MUST NOT

- Ignore environmental risks and hazards in your work or fail to dispose of waste in accordance with applicable requirements.
- Violate the Company's environmental operating procedures in a manner that causes pollution or ecological damage.
- Falsify environmental records, misstate emissions-reduction performance, or mislead internal or external stakeholders regarding the Company's environmental compliance.



WHAT SHOULD YOU DO?

As the shift supervisor at a municipal solid-waste incineration power plant operated by BE Environment, during a routine inspection you discover abnormal operating parameters in the leachate treatment system and effluent indicators approaching the applicable discharge limit. You also observe mixed waste disposal in the office area, with recyclables not effectively separated from general waste. A contractor suggests that an occasional minor exceedance is not a serious issue and would save costs. What should you do?

- Immediately stop any rough or improper operating practice that could result in an exceedance of discharge limits. Adjust system operating parameters and activate backup treatment units as necessary to ensure stable compliance with effluent standards. Record the abnormal conditions and corrective actions and report the hazard to the HSE management function, cooperating with investigation of equipment and process issues.
- Reject the contractor's proposal to “save costs by exceeding limits” and make clear that compliance with environmental law is a non-negotiable requirement. Report the communication to the responsible manager and the HSE Management Committee and cooperate with subsequent rectification and assessment to protect the Company's environmental compliance record and reputation.



FURTHER REFERENCE

For detailed requirements, please refer to the [Policy of Health, Safety and Environment of Beijing Enterprises Holdings Limited](#), the HSE Management System Manual of Beijing Enterprises Holdings Limited and other relevant policies and procedures.

(2) Resource Management

BEHL regards resource management as an important foundation of sustainable development, actively promotes circular-economy practices and takes an integrated lifecycle approach to waste and water-resource management.

For waste management, the Company follows the principles of reduction, resource recovery and harmless treatment, supported by systematic waste-management plans covering prevention at source, classification during operations and resource recovery at the end of the process, so as to minimise landfill disposal and reduce environmental impacts. For water resources, the Company has established a comprehensive water-risk assessment framework, embeds water conservation and water-risk prevention into its development strategy and continuously improves water-use efficiency and recycling rates. Through quantitative targets, employee training, performance monitoring and external disclosure, the Company seeks to ensure that resource management is standardised and transparent and balances economic and environmental benefits.



YOU SHOULD

- Use natural resources responsibly and improve resource-use efficiency.
- Conserve resources and promote the use of water-saving and energy-efficient equipment.
- Follow Company policies, procedures and operating guidelines to ensure that waste use, transfer, storage, disposal, recycling and reuse are carried out safely and efficiently.
- Participate in resource-management training, accurately record resource consumption and waste generation, and support performance monitoring and continuous improvement.



YOU MUST NOT

- Waste natural resources such as water, electricity or gas in the course of your work or fail to use energy-efficient equipment as required.
- Dispose of waste contrary to operating procedures in a manner that causes secondary pollution or resource wastage.



WHAT SHOULD YOU DO?

You work in the waste-to-energy workshop of a solid-waste treatment project and notice that the efficiency of the boiler flue-gas waste-heat recovery system has declined, causing a substantial amount of heat energy to be discharged directly into the atmosphere, although the equipment has not yet reached its scheduled maintenance interval. What should you do?

- Recognise that declining waste-heat recovery efficiency can result in energy waste and increased carbon emissions and promptly report the issue to the technical department.
- Even though the scheduled maintenance interval has not been reached, proactively recommend a dedicated inspection and maintenance programme once the energy-efficiency issue is identified.
- Before the equipment is repaired, seek to reduce heat loss as far as practicable by optimising operating parameters or taking other appropriate operational measures.
- After repairs, cooperate with the technical department in analysing the root cause and improving equipment inspection and maintenance plans to prevent recurrence.



FURTHER REFERENCE

For detailed requirements, please refer to the [Policy of Health, Safety and Environment of Beijing Enterprises Holdings Limited](#), the HSE Management System Manual of Beijing Enterprises Holdings Limited and other relevant policies and procedures.

(3) Biodiversity Conservation

BEHL recognises the importance of biodiversity conservation to ecosystem balance and sustainable development. The Company is committed to prioritising ecological protection in its operations and minimising operational impacts on the natural environment through systematic management measures.

The Company has established a biodiversity conservation mechanism for which management is directly accountable and applies internationally recognised conservation standards in project planning and operations. BEHL commits not to operate in World Heritage Sites or protected areas classified as Categories I to IV by the International Union for Conservation of Nature (IUCN). In areas of significant biodiversity value, the Company strictly applies the mitigation hierarchy of “avoid–minimise–restore–offset”, works towards “no net loss” and progressively advances towards a “net positive impact”. The Company protects forests and other terrestrial ecosystems and accelerates ecological restoration, and is committed to achieving zero deforestation across its own operations and supply chain by 2030.

Through collaboration among member enterprises, suppliers and business partners, BEHL promotes nature-friendly practices across the value chain, regularly monitors and discloses biodiversity performance and strengthens management accountability.



YOU SHOULD

- Within the scope of your responsibilities, pay attention to the protection of wildlife and habitats, prioritise avoidance and impact-minimisation measures, and support habitat restoration.
- Actively participate in Company-organised ecological activities such as tree planting and vegetation maintenance; do not release non-native species indiscriminately or otherwise disrupt local ecological balance.
- Proactively assess potential impacts on local ecosystems during project siting and planning.
- Consider the ecological compliance performance of suppliers and business partners and do not support business arrangements that damage biodiversity.



YOU MUST NOT

- Release non-native species indiscriminately in a manner that disrupts local ecological balance.
- Engage in the logging of natural forests or cause severe forest degradation.
- Carry out unassessed operations in nature reserves or other areas of high ecological value.



WHAT SHOULD YOU DO?

You are responsible for preliminary site selection for a new wastewater treatment plant at BE Water. The preliminary site is located upstream on a river that provides habitat for a rare local fish species. What should you do?

- Give high priority to the potential impact of the project on the local ecosystem and proactively carry out an environmental impact assessment.
- If the assessment indicates that the project could cause irreversible adverse impacts on the habitat of the rare fish species, recommend that the Company reassess the site-selection decision.
- If development in the area is demonstrably necessary, develop an ecological protection plan strictly in accordance with the “avoid–minimise–restore–offset” mitigation hierarchy.
- Ensure that the project plan appropriately consults local environmental authorities and ecological experts and seeks the views of communities and other stakeholders.



FURTHER REFERENCE

For detailed requirements, please refer to the [Management Policy of Biodiversity Protection of Beijing Enterprises Holdings Limited](#) and other relevant policies and procedures.

(4) Climate Change Response

BEHL regards climate change response as a strategic priority for sustainable development and actively supports China's carbon peaking and carbon neutrality goals. The Company seeks to establish medium- and long-term carbon-reduction targets using scientific methodologies and to maintain a robust greenhouse-gas emissions management system.

At headquarters level, the Company continues to strengthen climate-related risk assessment and management and embeds low-carbon development into strategic decision-making. Across its member enterprises, BEHL promotes targeted energy-conservation and emissions-reduction measures and continuously improves energy efficiency. The Company also promotes coordinated decarbonisation across the value chain and encourages employees to practise energy conservation in their day-to-day work, supporting a climate-resilient development model.

BEHL establishes and improves Scope 1, Scope 2 and Scope 3 greenhouse-gas accounting and management systems, sets science-based carbon targets, develops and implements climate transition plans aligned with national carbon peaking and carbon neutrality objectives, carries out climate-risk management, regularly conducts scenario analysis and resilience assessments for climate-related risks and opportunities, provides organisation-wide training, promotes the low-carbon transition of the supply chain and regularly discloses progress on climate action in accordance with applicable Listing Rules, thereby promoting the systematic and transparent implementation of climate action.



YOU SHOULD

- Prioritise low-carbon commuting options such as public transport where practicable to reduce carbon emissions.
- Proactively identify and report energy waste in offices and production sites, such as lights left on unnecessarily, idle equipment and leaks, and propose energy-efficiency improvements.
- Prioritise virtual meetings and other remote communication methods where appropriate to reduce unnecessary business travel.
- Actively participate in Company training on climate change, energy conservation and carbon reduction and integrate low-carbon requirements into your daily work.



YOU MUST NOT

- Ignore energy wastage or conceal high-energy-consumption or high-emissions risks.
- Disregard energy-conservation and emissions-reduction requirements in your work and cause unnecessary energy waste.
- Falsify or conceal carbon-emissions data or interfere with the collection, monitoring or statistical analysis of energy-consumption or carbon-emissions data.



WHAT SHOULD YOU DO?

As the production and operations supervisor of a wastewater treatment plant, during a routine inspection you find that office air-conditioning temperatures are set excessively low while doors and windows are open. An employee suggests that “there is no need to be so strict about a small amount of electricity cost; close enough is good enough”. A contractor also applies to add a high-energy-consumption standby pump for convenience. What should you do?

- Require the office area to comply strictly with applicable air-conditioning temperature standards, install energy-saving reminder notices and correct the practice of leaving doors and windows open. Promote daily energy-saving practices within the team, such as paperless working and switching off lights when areas are unoccupied, and incorporate energy-consumption performance into team assessments.
- Reject proposals based on “it doesn't matter” or convenience where they conflict with energy-efficiency requirements. Require the contractor to select equipment in accordance with energy-saving standards, prioritising high-efficiency models or variable-frequency drive solutions, and promote coordinated decarbonisation across the supply chain.



FURTHER REFERENCE

For detailed requirements, please refer to the [Policy of Climate Change Response of Beijing Enterprises Holdings Limited](#) and other relevant policies and procedures.

(5) Community Communication and Stakeholder Engagement

BEHL regards harmonious community relations as an important foundation of sustainable development and places strong emphasis on mutually beneficial coexistence with communities in the locations where it operates. The Board and senior management bear ultimate responsibility for stakeholder engagement. The Company has established stakeholder-engagement policies covering its own operations and supply chain and systematically identifies affected communities and vulnerable groups.

Community impact assessments are undertaken at an early stage of project planning. The Company establishes accessible complaint and grievance channels, meets with stakeholders regularly, and continuously improves its engagement approach based on survey feedback. BEHL seeks to ensure that community views are fully respected and effectively addressed throughout the project lifecycle, to strengthen community participation capacity and to promote effective implementation of relevant policies across its operations.



YOU SHOULD

- Actively participate in community engagement activities, demonstrate a responsible corporate image, listen patiently to residents' concerns and maintain constructive Company–community relationships.
- Proactively communicate positive and relevant information, such as project progress and environmental performance, to community residents, partner organisations and other stakeholders in order to promote understanding and trust.
- Promptly report recurring issues and reasonable suggestions identified through stakeholder engagement so as to support improvements in Company services and management.



YOU MUST NOT

- Ignore reasonable concerns raised by community residents or delay and avoid addressing community issues.
- Make commitments to a community in the Company's name without Company authorisation.
- Falsify community-engagement records or public-opinion survey results, or handle complaints or suggestions dishonestly or perfunctorily.



WHAT SHOULD YOU DO?

You are responsible for preliminary work on a solid-waste treatment project. After the project site is selected, nearby residents collectively oppose the project because they are concerned that waste incineration may generate harmful substances such as dioxins, and some residents petition government authorities. What should you do?

- Recognise that community concerns are understandable. Do not avoid or confront residents; instead, listen actively to their concerns.
- Report the community feedback to the Company and recommend holding an open community engagement meeting involving resident representatives, environmental experts and government representatives.
- At the engagement meeting, use professional data to explain the project's environmental protection technologies and emissions standards and present relevant successful project examples.
- Recommend establishing a long-term community-engagement mechanism and transparent information-disclosure channels, including regular publication of emissions-monitoring data and acceptance of public oversight.
- Consider appropriate public-welfare donations or other community benefit measures to strengthen community understanding of and support for the project.



FURTHER REFERENCE

For detailed requirements, please refer to [the Policy of Stakeholder Engagement of Beijing Enterprises Holdings Limited](#) and other relevant policies and procedures.

(6) Philanthropy and Community Development

BEHL actively fulfils the social responsibilities of a state-owned enterprise and deeply integrates philanthropy and community development into its corporate development strategy. In addition to participating in major public-welfare initiatives such as national energy supply and price stability, the Company develops targeted community programmes that reflect the characteristics of its industries and businesses.

Through appropriate resource commitments and professional management, BEHL seeks to ensure the sustainability and practical effectiveness of public-welfare programmes. Particular emphasis is placed on long-term community-development initiatives, including those that support economic transition. The Company regularly evaluates programme outcomes and discloses relevant information to society, with the aim of improving quality of life and strengthening sustainable development capacity in local communities.



YOU SHOULD

- Actively participate in charitable and public-welfare activities and donation programmes organised by the Company and social organisations.
- Actively cooperate with neighbourhood and community organisations in community co-development activities, strengthen relationships between the Company and local communities and contribute to a harmonious environment.
- Participate in science education, educational visits and other initiatives that support resource sharing and collaborative development.
- Pay attention to community-development needs in your day-to-day work and proactively provide constructive suggestions.



YOU MUST NOT

- Treat community co-development activities perfunctorily, avoid participation or be absent without proper reason.
- Misappropriate or embezzle public-welfare materials or funds intended for community development.
- Conduct charitable activities in the Company's name without approval.
- Use charitable or public-welfare activities as a vehicle for bribery, corruption or any other unlawful or non-compliant conduct.



WHAT SHOULD YOU DO?

You are responsible for community gas-safety awareness activities at Beijing Gas. During a community gas-safety lecture, a resident says that they would like to donate a batch of gas alarms “in the Company's name” to assist low-income or otherwise disadvantaged households. What should you do?

- Explain patiently that external donations made in the Company's name must follow the Company's prescribed approval and decision-making procedures, including the applicable budget approval process.
- Report the suggestion to your responsible manager. If the Company decides to make the donation, execute an appropriate donation agreement through formal procedures and record the donation accurately in the Company's books and records.
- If the resident wishes to make the donation in a personal capacity, the Company may provide technical support to assist with installation and subsequent maintenance.
- Recognise that gas-safety education of this kind helps strengthen community safety awareness and continue to promote such activities in your work.



FURTHER REFERENCE

For detailed requirements, please refer to the [Policy of Stakeholder Engagement of Beijing Enterprises Holdings Limited](#) and other relevant policies and procedures.



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