

## BUSINESS ETHICS

Business ethics are of utmost importance to Chindata Group and we are guided by the Chindata Group Code of Business Conduct and Professional Ethics, which covers business integrity and anti-corruption, anti-unfair competition, trade compliance, information security and data protection, and conflict of interest. All directors, management, and employees are required to abide by the Code of Conduct and foster an honest, trustworthy and upright operation environment.

### INTEGRITY CULTURE BUILDING

Integrity and self-discipline are highly valued by Chindata Group. There is zero tolerance for bribery or corruption in any form. A set of anti-corruption and anti-commercial bribery policies, including the Chindata Group Anti-Bribery and Anti-Corruption Policy, the Chindata Group Insider Trading Prevention Policy, and the Chindata Group Sunshine Supply Chain Rules, have been issued and disseminated to all employees at home and abroad, as part of our efforts to continuously maintain an institutional culture of integrity.

For anti-fraud purposes, the Group continues to refine the complaint and reporting mechanism, announcing the reporting channels in accordance to the Chindata Group Reporting and Investigation Regulations, and ensures regular maintenance of these channels. The handling process of reported cases has been improved and put into trial operation before its official launch. To protect whistleblowers, the Group undertakes responsibility for the fairness of the handling process and results, and protecting the personal privacy of whistleblowers, and cracking down on retaliation. There were no recorded occurrences of commercial bribery or corruption during the reporting period.

### CHINDATA GROUP ANTI-CORRUPTION AND ANTI-COMMERCIAL BRIBERY POLICIES

*Chindata Group Code of Business Conduct and Professional Ethics*

*Chindata Group Anti-Bribery and Anti-Corruption Policy*

*Chindata Group Insider Trading Prevention Policy*  
*Regulations on Avoiding Conflicts of Interest in Chindata Group*

*Basic Work and Integrity and Self-discipline Rules for Employees of Chindata Group*

*Regulations on Employee Rewards and Punishments*

*Chindata Group Sunshine Supply Chain Rules*

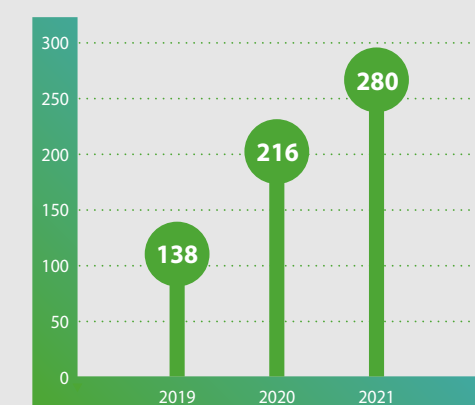
Reporting email: [jubao@chindatagroup.com](mailto:jubao@chindatagroup.com)

### INTELLECTUAL PROPERTY PROTECTION

Chindata Group values intellectual property protection and abides by the Copyright Law of the People's Republic of China, the Patent Law of the People's Republic of China, the Trademark Law of the People's Republic of China, the Regulations on Computer Software Copyright Registration, and other applicable laws and regulations, and continually refine and improve our intellectual property management system.

As a technology-driven company, we conduct extensive research on cutting-edge technology and dynamically deploy them in areas such as renewable energy, green data center design and construction, and digital computing power. The Group has been an industry leader in the number of patents for many years and holds multiple patents in technologies in big data, cloud computing, computer graphical interface, mechanical equipment, power distribution system, renewable energy, data centers, and building construction. As of December 31, 2021, the Group has 280 pending and approved patents, including patents for invention, external design, utility models, 38 software copyrights, and 44 trademarks. Additionally, the Group has put in place a unique bonus structure to encourage and reward employees for their innovations and creations.

### GROWTH IN THE NUMBER OF PATENTS HELD BY CHINDATA GROUP OVER THREE YEARS



## SUPPLY CHAIN MANAGEMENT

The key to ensuring the high-quality development of data centers is to practice healthy and sustainable supply chain management. Chindata Group is dedicated to extending ESG management throughout the supply chain in order to create a green and compliant supply chain system.

With whole lifecycle management, the Group evaluates supplier performance, manages risks, and controls critical points in the supply chain. Our in-depth communication with suppliers is not limited to business discussions; we also inform them our sustainable development requirements. The Group monitors the ESG performance of suppliers, in areas such as environmental protection and the rights and interests of employees. To provide guidance for responsible procurement, the Group has formulated the Management Regulations on Suppliers of Chindata Group, the Management Regulations on Procurement in Chindata Group, and the Implementation Standard of Environment, Society, and Governance in the Supply Chain.

At the same time, the Group attaches great importance to EHS management and business ethics requirements throughout the supply chain. In 2021, all suppliers signed anti-fraud and anti-corruption agreements. To improve the sustainable development management of suppliers and build a responsible supply chain, the Group holds trainings for suppliers from time to time on topics such as environmental protection, employee management, and supply chain compliance. In 2021, Chindata Group conducted 4 supplier ESG trainings in total.

### WHOLE LIFECYCLE MANAGEMENT OF SUPPLIERS

|                      |   |
|----------------------|---|
| ACCESS<br>STAGE      | <ul style="list-style-type: none"> <li>Conduct all-round supplier assessment, including CSR review, qualification certificate verification, and other aspects to ensure that their competence meets procurement needs</li> <li>Determine bid winners through bidding, inquiry, price comparison, and negotiation</li> <li>Require suppliers to obtain ISO 14001 Environmental Management System certification in green data centers, and fulfill requirements on environmental protection grades and materials certification</li> </ul>   |
| CONTRACT<br>STAGE    | <ul style="list-style-type: none"> <li>Require suppliers to sign the anti-commercial bribery and non-disclosure agreements before bidding, and to sign the Chindata Group Sunshine Cooperation Agreement upon signing contracts</li> <li>Require engineering construction suppliers to abide by regulations on environmental protection, health, and safety, identify potential hazards in environmental protection, health, and safety for projects, and develop management and control measures</li> <li>Organize trainings for suppliers in the application of the supplier system, integrity, and EHS management</li> </ul> |
| COOPERATION<br>STAGE | <ul style="list-style-type: none"> <li>Evaluate suppliers from multiple dimensions such as quality, delivery time, technology, operation, and maintenance, cost control, contract performance, and service timeliness by the Supplier Performance Assessment and Control Rules, and require and supervise material suppliers to use recyclable construction waste materials</li> <li>Encourage suppliers to implement the best sustainability practices in the industry</li> </ul>  |

#### Digital Upgrade of Supply Chain Management

With the rapid evolution of digital technology, the digital upgrade of supply chain management has become an important part of operations. In 2021, Chindata Group launched a supplier management system that aims to ensure smooth information flow of each procurement process with digital tools and information-based means, so as to improve the efficiency and transparency of supply chain management.

1,210 suppliers were added to the Group's supplier management system after passing checks and verification as of December 31, 2021. In the future, with digital transformation and the support of increasingly mature digital supply chain technology, the Group will collaborate with suppliers to build a more efficient and sustainable supply chain management system.