

ANTI-CORRUPTION COMPLIANCE POLICY

反腐败合规政策

All Employees are required to comply with the policies and guidelines set forth below in this Anti-Corruption Compliance Policy (the "Policy") adopted by ChinaCache International Holdings Ltd. (the "Company"). The Policy applies to the Company, its subsidiaries, and its affiliated companies, as well as to those acting on behalf of the Company, including officers, directors, employees, shareholders, dealers and other agents or third parties acting on behalf of the Company, collectively referred to herein as "Agents."

全体员工均须遵守下述由 ChinaCache International Holdings Ltd.（下称本“公司”）通过的本《反腐败合规政策》（“政策”）中规定的政策和指引。政策适用于本公司及其子公司和关联公司，以及代表本公司行事的人员，包括本公司的高管人员、董事、雇员、股东、经纪人和其他代理人或代表本公司的第三方，上述各方以下统称为“代理人”。

I. Prohibition Against Bribery **禁止收受贿赂**

The Company is a leading provider of Internet content and application delivery total solutions in China, offering a portfolio of services and solutions to businesses, government agencies and other enterprises to enhance the reliability and scalability of their online services and applications and improve end-user experience. Recognizing that the Company is a U.S.-listed company that operates in a highly-regulated industry in China where it must interact with government regulators, and its target customers include local government entities and officials, it is critical that the Company, its officers, directors, employees, shareholders, and agents comply with all applicable anti-corruption laws.

本公司作为中国领先的互联网内容及应用交付全面解决方案提供商，向各类公司、政府机构及其他企业提供多种服务和解决方案组合，加强其在线服务和应用的可靠性及升级性，提升终端用户的体验。本公司为美国上市公司，经营的业务领域属于中国受到高度管控的行业，需要与政府监管人员接触，且其目标客户群中包括当地政府机构及官员，鉴于上述几点，本公司及其高管人员、董事、雇员、股东及代理人必须遵守全部适用的反腐败法律，这一点对本公司而言至关重要。

We comply fully with the letter and the spirit of the U.S. Foreign Corrupt Practices Act and all anti-corruption laws in China and other jurisdictions where we do business. ***The Company strictly prohibits engaging in or tolerating bribery or any other form of corruption.***

我们从形式到内容上均严格遵守《美国反境外腐败行为法》（FCPA）以及中国及其他我们经营业务的司法管辖区内的所有反腐败法律。**本公司严格禁止从事或容忍任何贿赂或其他形式的腐败行为。**

This Policy strictly prohibits the Company and its officers, directors, employees and agents, from giving or offering to give money or anything of value to government officials to secure any improper advantage, or to obtain or retain business. This Policy also prohibits offering or giving money or anything of value to a political party, a party official or a

candidate for political office in order to influence official acts or decisions of that person or entity, to secure any improper advantage, or to obtain or retain business.

本政策严格禁止本公司及其高管人员、董事、雇员和代理人以获得不当利益或取得或保留业务为目的，向政府官员提供或主动要求提供金钱或任何有价物。本政策亦禁止以获得不当利益或取得或保留业务为目的，向任何政党、政党官员或政党候选人提供或主动要求提供金钱或任何有价物，以影响有关人士或实体的职务行为或决定。

Under this Policy, "anything of value" is defined broadly and is not limited to cash – it includes travel, meals, gifts, and other tangible or intangible benefits.

在本政策中，“任何有价物”定义广泛，不仅限于现金 - 还包括差旅、餐饮、礼品、其他有形或无形福利等。

In addition, this Policy prohibits conveying anything of value either directly or indirectly. Thus, the Policy prohibits corruptly conveying a thing of value to a government official through dealers, agents, contractors, intermediaries, or other third parties. Benefits to family members of government officials are similarly prohibited. Nor is there an exception if the government official demands or suggests the payment.

此外，本政策禁止直接或间接传递任何有价物。因此，本政策禁止出于腐败的目的通过经纪人、代理人、承包商、中介或其他第三方机构向政府官员传递任何有价物。本政策同样禁止向政府官员的家属提供或传递任何福利，即使政府官员如此要求或暗示。

Further, this Policy requires that we keep accurate books and records that fairly reflect all transactions involving the Company's assets, and that all transactions are properly authorized.

本政策还规定，本公司账簿记录应准确、公允地反映出涉及本公司资产的全部交易，并且全部交易应得到适当授权。

It is important to recognize that significant fines and penalties can be imposed for violations, including substantial jail time for criminal violations. Employees may not avoid liability by "turning a blind eye" when circumstances indicate a potential violation of the Policy. If any employee has any doubts or questions as to whether his or her conduct is permissible under this Policy or believes a violation of our Policy has occurred, is occurring, or will occur, he/she must contact the Company's Legal Department (or the Company's Compliance Hotline) immediately.

需要注意的是，违规行为可能导致重大的金钱和其他处罚，如存在犯罪行为还将导致入狱。如存在潜在违反本政策的情况，员工不得以未察觉为名逃避责任。如员工对其行为是否符合本政策存有疑虑，或认为此前、现在或日后将发生违反本政策的行为，应立即联系本公司法务部（或拨打本公司的合规热线）。

A. Government Officials

政府官员

This Policy is implicated whenever something of value may be transferred to a "Government Official." Under this Policy, Government Official is defined very broadly, and includes:

本政策涉及任何向“政府官员”传递有价物的行为。本政策下政府官员的定义非常广泛，包括：

- Any person engaged in public duty in a government agency. Under our Policy, this includes any elected or appointed official or employee of a government, at any level, including national or local government entities. This includes members of legislative, administrative, and judicial bodies, as well as low-level employees of government agencies, such as office workers;
在政府机构中担任公职的任何人。在本政策中，包括被选举或任命的任何级别政府（包括国家或当地政府实体）的官员或雇员。还包括立法、行政和司法机关中的成员，以及政府机构中的低级雇员，如办公室工作人员；
- Any officer or employee of government-owned or government-controlled entities, including state-owned entities that operate in the commercial sector, such as an employee at a state-owned company;
政府所有或政府控制实体（包括在商业领域经营的国有实体）的官员或雇员，如国有公司的雇员；
- Any officer or employee of a public international organization (such as the United Nations, the World Bank or the International Monetary Fund);
国际公共组织（如联合国、世界银行或国际货币基金组织）的任何官员或雇员；
- Any person acting in an official capacity for a government, government agency, or state-owned enterprise (for example, someone who has been given authority by a government entity to carry out official responsibilities); and
以官员身份为政府、政府机构或国有企业行事的任何人（如经政府实体授权履行官方职责的任何人）；及
- Any political party, official of a political party, and any candidate for political office.
任何政党、政党官员和政党候选人。

If you have any questions about whether an individual is a Government Official under our Policy, please contact the Company's Legal Department.

如对任何人是否属于本政策规定的政府官员有任何疑问，请联系本公司法务部。

B. Things of Value **有价物品**

The Policy prohibits offering a Government Official "anything of value" as a bribe. As noted above, this is broadly defined and includes non-cash items such as gifts, meals, entertainment, golf outings, favors, services, loans and loan guarantees, investment or business opportunities, the use of property or equipment, job offers (even to a Government Official's relatives), transportation, and the payment or reimbursement of debts. Even small payments or benefits are prohibited if they are intended as bribes.

本政策禁止向政府官员行贿，即提供“任何有价物”。如上所述，有价物定义非常广泛，包括非现金物品，如礼品、餐饮、娱乐、户外高尔夫、优惠、服务、贷款和贷款担保、投资或商业机会、使用财产或设备、提供工作（包括向政府官员的亲属）、交通、债务偿付或报销等。以行贿为目的的支付或福利，即使数目很小，也属于禁止行为。

C. Securing an Improper Benefit **获得不当福利**

As with other aspects of this Policy, the prohibitions on a payment to secure an improper benefit or obtain or retain business are defined broadly. Under this Policy, this includes any commercial or financial benefit, not only a payment to secure a sale or contract. For example, a payment to persuade a Government Official not to impose a fine or tax, or to minimize such a fine or tax, would violate the Policy, as would a payment to prevent enforcement of an applicable law or regulation. Similarly, payments to influence a Government Official's decision to award a permit or license would violate the Policy.

本政策禁止为获得不当福利或取得或保留业务进行支付，有关支付的范围非常广泛，包括商业或财务福利，而不仅仅是为取得销售或合同进行的支付。例如，为说服政府官员减免罚金或税金而进行的支付，以及阻止履行有关法律法规而进行的支付，均将违反本政策。与之类似，影响政府官员是否授予批准或许可而进行的支付，也违反本政策。

II. Additional Guidance **其他指引**

A. Commission Payments **佣金支付**

Any kickbacks or other payments to a customer in any form to secure that customer's purchases are prohibited by this Policy. This prohibition applies to kickbacks paid directly by the Company as well as to payments made indirectly, such as payments made to customers by members of the sales or marketing staff using funds paid to them by the Company as sales commissions or salaries.

为争取客户采购产品而以任何形式向客户支付回扣或其他款项属于本政策下的违禁行为。该项禁止规定涵盖公司直接支付的回扣，以及间接支付的回扣，例如公司销售或市场营销员工使用公司向其提供的作为销售佣金或薪酬的资金向客户作出的支付。

B. Retention of Third Parties **使用第三方**

This Policy prohibits indirect payments to Government Officials, such as payments through a third party. Retaining the services of any third party, including a dealer, agent, consultant, contractor, intermediary or representative can raise compliance issues. For further guidance, please refer to the Company's policies regarding agents and consultants.

本政策禁止向政府官员进行间接支付，如通过第三方进行支付。使用第三方服务，包括经纪人、代理人、顾问、承包商、中介或代表，均可能导致合规问题。欲进一步了解指引内容，请参阅本公司有关代理人和顾问方面的政策。

C. Gifts, Meals and Entertainment **礼品、餐饮和娱乐**

Although business meals and entertainment and business gifts may be common practices, certain benefits to Government Officials may violate governing laws, rules and regulations. ***Providing meals or entertainment or making gifts with the intention or appearance of improperly influencing a third party in order to obtain or retain a business advantage for the Company, or for any other corrupt purpose, is strictly prohibited.***

虽然商务餐饮、娱乐和礼品属于常见的商业行为，但向政府官员提供某些福利可能违反有关法律、法规和条例。***如提供餐饮、娱乐或礼品的意图是或表现为对第三方造成不当影响，从而为本公司获得商业利益或达到其他腐败目的，则应严格禁止。***

It is important to recognize that cash gifts to Government Officials are prohibited in all circumstances. Cash equivalents, such as gift cards, phone cards, meal vouchers or cards, are also prohibited.

需要注意的是，向政府官员提供现金礼品在任何情况下都属于禁止行为。现金等价物，如礼品卡、电话卡、餐券或餐卡，也属禁止之列。

All expense reimbursements must be supported by receipts and must be properly recorded and approved in accordance with Company policies. In the event that a cash advance is obtained to pay for a permissible gift, a business meal or entertainment, Company Policy requires that appropriate documentation of the expense, including original receipts, be maintained and submitted pursuant to the Company's reimbursement procedures, as outlined in the Company's expense reimbursement policy. Gifts, meals and entertainment are never permissible, regardless of their value, if the purpose of giving them is to improperly influence a decision by a Government Official.

所有费用报销必须随附收据证明，得到适当记录，并依据本公司政策予以批准。如为购买经允许的礼品、支付商务餐饮或娱乐活动而取得现金预付款的，本公司政策规定应当按照本公司费用报销政策中规定的报销流程留存并提交所发生费用的适当凭证（包括收据原件）。任何礼品、餐饮及娱乐活动，一旦以不当左右政府官员决定为目的，无论价值多少，均属禁止之列。

D. Travel **差旅**

Under this Policy, things of value also include travel expenses, such as travel to inspect the Company's offices or facilities or to a seminar or promotional event sponsored by the Company. The Company's Policy allows, with strict controls, certain travel expenses that are directly related to the promotion or demonstration of the Company's products and services, or are necessary for the Company to fulfill its obligations under a contract. However, the issue of travel expenses can raise complicated compliance questions. ***Paying for or reimbursing travel expenses with the intention or appearance of improperly influencing a***

third party in order to obtain or retain a business advantage for the Company, or for any other corrupt purpose, is strictly prohibited.

本政策规定，有价物包含差旅费，如前往本公司办公地点或设施进行检查的差旅费，或参加本公司举办的研讨会或宣传活动的差旅费等。在严格管控的前提下，公司政策允许某些与公司产品服务的推广或演示直接相关的，或公司履行其合同义务所必需的差旅费。尽管如此，差旅费可能导致复杂的合规问题。***如支付或报销差旅费的意图是或表现为对第三方造成不当影响，从而为本公司获得商业利益或达到其他腐败目的，则应严格禁止。***

The policy for business trips and associated meals and entertainment is as follows:
出差及相关餐饮娱乐的政策如下：

1. Advance approval for a Government Official to travel from his or her home location is required.

政府官员从住所地出发的，须经事先批准。

2. Travel expenses for a Government Official may be incurred only if the main purpose of the trip is to attend a conference or business meeting sponsored by the Company, or to visit Company facilities for educational or promotional reasons directly related to the Company's business. Sponsoring travel of a Government Official when no Company employee is present for the associated business activity is not permitted under this policy.

只有在差旅的目的是参加本公司主办的研讨会或商务会议，或与本公司业务直接相关的教育或宣传原因拜访公司场地的前提下方可产生政府官员差旅费。本政策禁止在没有任何本公司员工参加相关商业活动的前提下赞助政府官员的差旅。

3. Invitations to conferences, meetings, or other permissible events that require travel of a Government Official should be open and transparent. Where possible, the Government Official's supervisor should be notified of the invitation.

邀请政府官员参加需要出差的研讨会、会议或其他经允许的活动的，应当公开透明。如可能，应将该等邀请告知该政府官员的主管上级。

4. The Company may pay only reasonable expenses that are actually incurred by Government Officials and are directly related to the business purpose of the trip. In general, the following types of expenses will be approved and may be reimbursed as reasonable expenses:

公司仅支付政府官员实际发生的，与差旅的商业目的直接相关的合理费用。一般来说，以下类型的费用将获得批准，并作为合理费用批准报销：

- (a) Flight arrangements and hotel expenses that are in line with the Company's travel policy.

符合公司差旅政策的航班安排和酒店费用

- (b) Appropriate ground transportation.

适当的地面交通

(c) Meals and entertainment costs that are reasonable and in line with Company reimbursement policies, if they are arranged as part of a business event and are of subordinate importance and value to the business purpose.

作为商业活动的一部分被安排、对商业目的具有次要重要性和价值、数目合理且符合公司报销政策的餐饮及娱乐费用。

5. The Company may not pay any expenses for spouses and other family members of Government Officials. If family members accompany a Government Official, the Company will not advance or reimburse any travel expenses incurred by the family members.

本公司不得为政府官员的配偶及其他家庭成员支付任何费用。如家庭成员陪同政府官员一起出行的，本公司不得就该等家庭成员发生的任何差旅费用支付任何预付金或提供任何报销。

6. Wherever possible, expenses should be incurred directly by the Company, rather than reimbursed to the Government Official. Thus, the Company should pay airfares, ground transportation, hotel expenses, and meal expenses directly to the travel service provider.

费用应尽可能地由公司直接产生，而非为政府官员提供报销。因此，本公司应当直接向差旅服务提供商支付机票、地面交通、住宿及餐饮费用。

7. The Company may not pay a cash advance to a Government Official for any purpose. In the event that the Government Official incurs permissible expenses during an approved trip, expenses must be submitted in a manner consistent with the Company's expense reimbursement policy.

公司不得为任何目的向政府官员支付现金预付款。如政府官员在经批准的差旅中发生允许的费用，应以符合公司费用报销政策的方式提交费用报销申请。

8. Per diems may not be paid to Government Officials for any reason. All incidental expenses (for example, taxis, coffee and tea) must be documented.

不得因任何原因向政府官员支付按日出差补贴。产生的所有杂费（如出租车、咖啡和茶的费用）均需附凭证支持并记录在案。

9. Receipts, fapiao, other supporting documentation, and trip-related correspondence must be collected and maintained. The agreed purpose of the trip should be carefully documented in the Company's files and, when appropriate, the Government Official's superior should be notified of the trip. All such documentation must be maintained according to the Company's document retention policy.

公司必须汇集并保留收据、发票及其他凭证，以及与差旅相关的书信往来。公司文档中应仔细记录差旅的约定目的，适当时应将差旅告知政府官员的主管上级。所有此类文件及凭证均应按照公司文件保存政策进行留存。

E. "Grease" or "Facilitating" Payments “通融费”或“便利费”

It is Company Policy that all payments to Government Officials to secure an improper advantage, including nominal "facilitating" payments made to Government Officials to expedite or to secure the performance of a routine governmental action, are strictly prohibited.

本公司政策规定，为获得不当利益向政府官员进行的全部支付，包括加速或取得正常政府行为而做出的象征性“通融”支付，均应严格禁止。

F. Employee Receipt of Gifts and Entertainment **员工收取礼品及娱乐款待**

As detailed in the Company's Code of Business Conduct and Ethics, company policy prohibits employees from receiving gifts or entertainment that influence, or could be viewed as influencing, business decisions. Employees are prohibited from receiving anything of value – including meals, entertainment, favors or gifts – if the purpose of such an item is to improperly influence the employee in his work. Thus, employees may not receive anything of value as an improper inducement to make any decision related to your responsibilities, such as to award a contract or to favor one vendor over another. Employees are encouraged to submit to the Company gifts they receive in the course of their work, and all gifts in excess of RMB200 must be submitted immediately to the administration department of the Company.

如公司的《商业行为及道德准则》中所规定，公司政策禁止员工收取任何对商业决定造成影响，或可能被视为造成影响的礼品或娱乐款待。员工禁止收取任何意图对员工的工作造成影响的有价物，包括餐饮、娱乐、优惠或礼品。因此，对于任何有价物，一旦构成员工作出任何职务决定（如给予中标或对供应商厚此薄彼）的不当引诱，均属于禁止员工收取的对象。公司鼓励员工上交工作过程中收到的礼物，所有价值超过人民币 200 元的礼品均须立即上交给公司行政部门。

III. Sanctions **惩处措施**

Upon discovering a violation of our Policy, the Company may impose such sanctions as it deems appropriate, including, among other things, a letter of censure or suspension or termination of the employment of the violator or termination of the Company's agreement with a third-party violator.

如发现违反本政策的行为，本公司可采取其认为适当的惩处措施，包括书面通报批评，暂停或解除与违反者的劳动关系，或暂停或解除与第三方违反者的协议等。

IV. Compliance Procedures **合规程序**

A copy of this Policy will be furnished to all current and newly hired employees. This Policy has attached to it an Acknowledgment of Receipt form indicating that the employee has read, understood, and will comply with the guidelines contained in this Policy. The signed form must be returned to the Legal Department, and it will be kept in the employee's personnel file.

本政策应向全部现任和新入职员工提供。员工签署本政策所附的确认函，即表明有关员工已经阅读、理解并遵守了本政策中的各项指引。签署后，应将确认函返还至本公司法务部，并应保存在员工的个人档案中。

All Company employees will be required to pass a test each year covering, among the other things, the guidance contained in this Policy and other Company policies and procedures(the “Annual Test”). The results of the Annual Test will be sent to each employee’s supervisor and will constitute a part of the employee’s performance evaluation. The test results will be kept in each employee’s personnel file.

公司全体员工每年均需通过一次测评，内容涵盖本政策中的各项指引及公司其他政策及程序（下称“年度测评”）。年度测评的结果将发送给每位员工的主管人员，并构成员工绩效评估的一部分。测评结果应保存在每位员工的个人档案中。

If you have any questions or concerns regarding the Policy, you should speak to your supervisor or Ms. Lian Xue in Legal Department. The Policy cannot and is not intended to cover every aspect of governing anti-corruption laws or provide answers to all questions that might arise. Accordingly, we encourage each employee to seek guidance from the appropriate legal and compliance personnel within the Company on the appropriate course of conduct regarding issues arising under the Policy.

如对本政策有任何问题或疑虑，请与您的主管上级或公司法务部的薛莲女士联系。本政策可能未涉及有关反腐败法律的各个方面，且未解答可能出现的所有问题。因此，对于本政策中出现的任何问题，我们鼓励员工通过适当的方式向公司适当的法务及合规人员寻求指引。

ANTI-CORRUPTION COMPLIANCE POLICY
ACKNOWLEDGEMENT OF RECEIPT

反腐败合规政策

确认函

I, _____, certify that I have received a copy of the Company's Anti-Corruption Compliance Policy (the "Policy"), I understand the policies and procedures contained therein, and I agree to follow those policies and procedures at all times. I understand and agree that if I violate the Policy, the Company may impose such sanctions on me as it deems appropriate, including without limitation a letter of censure, or suspension, or termination of my employment. I further confirm that, should I learn or have reason to know of any potential violations of the Policy or any applicable laws, I will immediately notify Ms. Lian Xue in the Company's Legal Department.

本人，_____，确认已收悉公司的《反腐败合规政策》（本“政策”）。本人理解并同意始终遵守本政策中规定的各项政策及程序。本人理解并同意如果本人违反本政策，公司有权以其认为适当的方式对本人进行惩处，包括但不限于书面通报批评或暂停或解除与本人的劳动关系。本人进一步确认如若得知或有理由知晓任何对本政策或适用法律的潜在违反行为，将立即通知公司法务部的薛莲女士。

Signed,
签字：

NAME:
姓名：

TITLE:
职务：

DATE:
日期：