

江苏华程工业制管股份有限公司

JIANGSU HUACHENG INDUSTRY PIPE MAKING CORPORATION

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HUACHENG GROUP

ISO, DNV, PED97/23/EC, BV, API, CCS Approved

January 10th, 2021

To: Whom it may concern

Modern Slavery Statement

Introduction

Jiangsu Huacheng Industry Pipe Making Corporation(Huacheng), located in Zhangjiagang, a new National Sanitary Civilized Harbor Industry City, set up in 1997 with a small pipe making factory that less employees less than 100 staff, has grown into a modernized Joint-Stock Enterprise that now employs more than 1000 staff and integrating Scientific Research, Manufacturing, Logistics and Trading over a decade's development, and has been ranked among the top 50 industrial enterprises of Zhangjiagang City in recent years.

Huacheng, occupying the land over 200,000 square meters, has 200 technicians including 20 senior engineers. Our total registered capital has been over RMB 150 million and our total net assets value has exceeded RMB 300 million. In 2008, our industrial production value exceeded RMB 800 million, total trading amount was over RMB 1 billion, and all kinds of investment on technology and rebuilding over RMB 100 million.

Huacheng, mainly specialized in manufacturing and marketing on steel tubes & pipes. Now we have five manufacturers with total capacity of 60,000 tonnes of Cold Drawn/Rolled Seamless, 50,000 tonnes of Electrical Resistance Welded, 30,000 tonnes of Cold Drawn Welded(DOM) and 30,000 tonnes of Cold Drawn Special Shape/Large Diameter, the first phase(10,000 tonnes) of 30,000 tonnes high alloy project already completed. Total annual capacity of 200,000 tonnes for above five types and manufacturing base of high quality steel tubes & pipes(medium & small diameter) will be realized soon. Our tubes & pipes can be widely used in Power Plant Boiler, Heat Exchanger, Automobile Components, Mechanical Structure, Bearing Machining, Shipbuilding, Bridge Construction, Petroleum Exploration & Transportation,

and some other relative fields.

Huacheng, owns five subsidiaries, which are Zhangjiagang Salem Fine Tubing Co.,Ltd. , Zhangjiagang Huacheng Special Shape Tube Co.,Ltd. , Zhangjiagang Huacheng Suns Speciality Pipe-Making Co.,Ltd. , Zhangjiagang Huacheng Import & Export Co.,Ltd. and Yangzhong Haina Tube-Making Co.,Ltd.

Huacheng, owns six independent enterprises and one Research & Development Centre. The favorable organization structure and operation mode, lay the foundation for continuable development, and erect a steady platform for the realization of global development strategy.

Being the far-sighted and with a development vision of Internationalization, Huacheng Corporation will always Sticks to the idea of "Huacheng's pursuit of value & cooperation is based on mutual benefits". We warmly welcome domestic and oversea friends to give counsel for development, and sincerely hope the realization of close cooperation on each field.

Be real honesty and pure credit

Huacheng's Pursuit of value cooperation is based on mutual benefit.

Our Concept: Try to do is better than no action, action without thinking is do nothing

Our Spirit: Harmony, Innovation, Mutual benefit, Environmental protection, High-efficiency.

Our Guidelines for Action: Create values for customers, employees and the society.

Our Mission: to be a worldwide top-ranking brand of manufacturing base of high quality steel tubes & pipes

Our Strategic Idea

Take market as the guiding, building market in an aborative way

Take technology as the core, founding Huacheng Brand

Take beneficial result as the root, deepening basic management

Take contribution as the principle, constructing harmonious Huacheng



Takes social responsibility as the endogenous driving force of enterprise development.

Social responsibility refers to the responsibility of an organization to the society. An organization should operate and manage in a way that is conducive to society. Social responsibility usually refers to the social obligations undertaken by an organization higher than its own goals. It surpasses the obligations required by the law and economy on the organization. Social responsibility is the requirement of organizational management ethics, and it is completely voluntary out of obligation.

Supplier Management

A stable and harmonious supply chain is an important foundation for us to achieve sustainable development. Committed to continuously improving the level of supplier management through green procurement, sunshine procurement, smart procurement, etc., Continuously improve the level of supplier management, actively participate in industry activities, and work with partners to develop together.

HSE (Health, Safety and Environment System)

Huacheng is keeping growing with its HSE commitment to environmental protection, occupational safety and health in workplace. Huacheng attaches great importance to the health and safety of employees, and has developed a sound safety management system.

New employees should first receive safety, environmental protection, and occupational health training, and take post only after passing the assessment; A copy of the "Safety Operation Manual" is provided to every employee for learning Sign liability statement with the heads of production units to strengthen the safety responsibility of management at all levels; Hold a monthly safety inspection to eliminate safety hazards in time; Huacheng carries out emergency plan drills every year to improve the ability of all employees to respond to emergencies.

Huacheng organizes the staff to undergo the physical examination every year, truly paying attention to the staff's health.

Protecting the environment is our responsibility. While developing, Huacheng strives to achieve the harmonious development of people, society and the environment. The Company strives to build an information management platform centered on ERP.

Reporting

The company continues to focus on the environmental protection policy of "cleaner production, pollution prevention, resource conservation and sustainable development", relying on technological transformation, the implementation of cleaner production and energy saving and consumption reduction process, effectively reducing production costs. During the reporting period, the company improved the process of the existing sewage station. Compared with the same period last year, the amount of hazardous solid waste decreased by more than 5%. Improvement of bid and reduction of pollution factors. Strengthen training and improve personnel quality.

HUACHENG also provides systematic compliance trainings for sales team and employees on the compliance focus areas anti-corruption, anti-trust, import & export control. We respect and support compliance with internationally recognized human and children's rights and reject Modern Slavery. We are fully committed to establishing, maintaining and improving systems and processes to prevent Modern Slavery in our own business.



Zhang Zeqing

General Manager



Jiang Xinyi

Chief Financial Manager



Yang Risheng

Member of Directors