

Supply Chain ESG Management Guidelines

Noah Holdings enterprise management focuses on ethics, regulations and social responsibilities, and expects support from our suppliers. In this regard, Noah Holdings has developed the *Supply Chain ESG Management Guidelines*, stipulating that all suppliers with which Noah has business relations shall comply with the laws of the countries where they are located, and shall provide excellent products and services in accordance with ESG-related international standards (environment, health and safety, employee rights and business ethics).

1. Environment

Noah Holdings expects all suppliers to reduce the negative environmental impact of their operations. Suppliers shall comply with national laws and regulations related to the environment, including but not limited to the following:

- Obtain necessary environmental permits, approvals or registration documents required for operation and maintain and update them regularly;
- Supervise, control and handle the wastes and harmful substances generated during operation on a regular basis;
- Conserve energy, reduce emissions and the consumption of natural resources through practical actions;
- Develop sustainable purchasing policies actively.

2. Occupational Health and Safety

Noah Holdings expects all suppliers to provide employees with a safe and healthy working environment that can minimize their health risks. Suppliers shall comply with national laws and regulations related to health and safety, including but not limited to the following:

- Create a clean and safe work environment;

- Provide appropriate workplace health and safety training;
- Establish a compensation system for work-related injury and illness;
- Adopt protective measures to prevent employees from injury and illness.

3. Employee Rights

Noah Holdings expects all suppliers to take actions to protect the rights of employees and treat them fairly. Suppliers shall comply with national laws and regulations related to employee rights, including but not limited to the following:

- Work hours: The maximum work hours of employees should comply with laws;
- Wages and benefits: Suppliers shall, in conformity with national laws and regulations, set wages for employees (such as the statutory minimum wage) and pay wages and benefits for their work (including overtime work) according to law;
- Free choice of employment: Suppliers shall not employ illegal and involuntary labor, including forced, bonded or indentured labor, and shall adopt reasonable procedures to ensure that their subcontractors and distributors adhere to these principles;
- Freedom of association: Suppliers shall recognize and respect employees' right to unionize under the national law;
- It is prohibited to discriminate against any employee on the basis of age, color, race, religion, gender, spiritual belief, ethnicity, national origin, physical and mental disability, marital status, pregnancy, sexual orientation, gender identity, military veteran or other personal status protected by the law.
- No harsh or inhumane treatment: Suppliers should treat each employee with respect and dignity, and will not subject any employee to threats of violence, punishment, imprisonment or any physical, sexual, psychological, verbal, or any other form of harassment or abuse.
- No child labor: Suppliers shall not employ children or any person younger than the age specified by the local law.

4. Business Ethics Conduct

Noah Holding strictly abides by high business ethics standards and the principle of good faith. Therefore, suppliers are expected to act in accordance with the highest ethical standards in all business activities, including but not limited to the following:

- Disclose any potential conflicts of interest of purchasing regarding Noah Holdings;
- Ensure compliance with laws against bribery, corruption and any improper business practices.

5. Compliance and Supervision

If any supplier fails to comply with the *Guidelines* after confirming and signing, Noah Holdings Administration Department will contact the supplier and, if necessary, evaluate and resolve its non-compliance through a pre-determined process.

- Suppliers shall promptly notify Noah Holdings in writing of any violation or suspected violation of the *Guidelines*.
- Employees of Noah Holdings should notify the Administrative Department to investigate and take appropriate actions if they find violations of the *Guidelines*.
- Noah Holdings Administration Department may require suppliers to provide relevant information about their compliance with the *Guidelines*, or conduct additional monitoring activities to determine whether suppliers are complying with the *Guidelines*, including on-site inspections, questionnaire surveys, reviews of publically-released information or other measures to evaluate suppliers' performance.
- Based on the assessment provided by the Administration Department, Noah Holdings reserves the right to disqualify any supplier from bidding or purchasing,

and to terminate cooperation with any supplier that commits egregious violations to the *Guidelines*.