

Anti-Corruption Policy

The Company is committed to eradicating corruption in all aspects of the Company's value chain to enhance anti-corruption awareness among employees at all levels and suppliers, ensure that they conduct themselves in accordance with professional ethics, and fulfill their responsibilities with a fair and upright attitude. This policy statement is under the overall supervision of the Board of Directors, jointly formulated by the Board of Directors and relevant senior management, regularly reviewed and improved.

These standards apply to all employees of the Company and all affiliated companies, including full-time, part-time, outsourced employees, as well as stakeholders who have business dealings with the Company and all affiliated companies.

The English translation of the Policy is for reference only and the Chinese version shall prevail in case of any inconsistency between the Chinese version and English translation thereof

1 Bribery, communication and benefits

Bribery is strictly prohibited by the Company, and no employee is allowed to offer, solicit or accept bribes, including soliciting or providing any benefits from or to customers, suppliers, legislative and/or law enforcement agencies or other personnel related to the Company's business; or act as a third-party intermediary to provide, solicit or accept any benefits. Anyone who solicits or accepts benefits in any form by taking advantage of his authority, regardless of getting permission from superior leaders, shall be deemed as violation of the Code.

1.1 Providing benefits: under no circumstances should employees offer bribes or illegitimate benefits to any individual or institution to seek personal gains or Company benefits.

1.2 Soliciting benefits: employees shall not directly, indirectly or in any form, solicit any benefits from any institution or individual related to the Company's business.

1.3 Accepting benefits: if an employee accepts any benefits directly or indirectly related to the Company's business, which hinders his objective judgment and processing of related business, induces him to violate or harm the interests of the Company, leads to violation of laws and

regulations and requirements of the place of listing, triggers complaints about favoritism or misconduct, and/or makes the employee feel that is necessary to repay the giver in business, the employee shall not accept the benefits.

“Benefits” under this Policy include, but are not limited to, cash and cash equivalents, gifts, hospitality, travel arrangements, services, discounts or any other items of economic value. Expensive gifts or hospitality exceeding reasonable business purposes or established standards may constitute improper benefits. Gifts of nominal value with commemorative nature and reasonable hospitality in line with the Company’s or industry standards may be acceptable, provided that they do not impair independent judgment or constitute improper benefit transfer.

1.4 All acts related to facilitation payment are prohibited.

2 Handling conflicts of interest

2.1 Definition of conflict of interest

The common conflicts of interest include but are not limited to the following situations:

2.1.1 Have undeclared financial interests/transactions with any suppliers, service providers or related personnel that have business dealings with the Company;

2.1.2 Hire service providers who are working or have worked for the Company to work or provide services, goods, etc. for themselves and/or their immediate family members;

2.1.3 Provide special preferential treatment to individual suppliers, service providers, customers, job seekers, subordinates or superior leaders, etc. for personal reasons;

2.1.4 Employees or their immediate family members (including parents, children and spouses) are getting engaged in or consider engaging in the things, investment or activities that have a conflict of interest with the Company or may cause a conflict of interest;

2.1.5 Carry out external work within the Company by taking advantage of the working hours and the Company’s assets (including human resources).

2.1.6 Provide assistance to the Company’s competitors; and

2.1.7 Privately provide or manufacture services or goods that compete with the Company.

2.2 Declaration of conflict of interest

The employees shall avoid actual or foreseeable conflicts of interest between individuals and the Company or that affect their judgment in performing their duties. The employees shall report all actual or foreseeable conflicts of interest in a timely manner.

2.2.1 If the employees realize that there is or may have a conflict of interest with the Company, they must immediately report to their department heads in writing.

2.2.2 If the employees fail to comply with the above requirements, severe disciplinary punishment may be caused, including demotion, dismissal, etc.

3 Insider trading

3.1 If employees have any important information about the Company or any other listed companies with which the Company does business and/or non-public data sensitive to stock prices, the employees shall not buy or sell the securities of the Company or these listed companies, or disclose relevant information to others before such data is made public.

3.2 The employees shall abide by all laws and regulations regarding insider trading. Any employee involved in insider trading will be punished according to relevant rules of the Company, or even dismissed. Meanwhile, the Company will also report to relevant law enforcement agencies.

4 Preventing Money Laundering

Money laundering is using otherwise lawful business transactions as a way to hide the source of money that has been obtained illegally. Money laundering typically involves payments in the form of cash or money order. Suspicious activity includes: large cash transactions as well as customers who are reluctant to provide verifiable information. We comply with applicable laws and regulations relating to money laundering. We do not condone, support or facilitate money laundering activities.

All the employees should:

4.1 Watch out for irregularities in the way payments are made.

The Company and all employees are not allowed to use property or other means to bribe and sell goods. Those who secretly give kickbacks to the other party's company or individual outside of the account shall be punished as bribery. When selling services and goods, if discounts are required to be given to the other party, including but not limited to commissions, physical items, etc. to intermediaries, they must be explicitly given to the other party, and possible supporting documents must be provided, and the finance department must be notified to truthfully enter the account.

7 Business partners, suppliers, and customers

7.1 Access to goods and services

The Company guarantees fair trade with our suppliers, fair competition in the competitive evaluation process to determine suppliers, without any discrimination or deception. The selection of suppliers should be based on the prices, services, quality, and reputation provided by the suppliers, and in accordance with the principle of being beneficial to the long-term business development of the company. When dealing with suppliers, employees should always maintain fairness and should not attempt to exert influence to obtain "special treatment" for a specific supplier, as this can jeopardize our competitive selection process. Employees cannot accept or demand personal benefits from suppliers and target suppliers to prevent damaging the fairness of supplier product and price evaluation. Employees should also keep confidential the pricing or product information submitted by suppliers or potential suppliers to the Company. The procurement agreement should be appropriately approved and clearly define the services and products provided, the calculation basis for payment, and the applicable prices and fees. The payment amount must match the service or product provided.

7.2 Items, discount, and gifts

For items, discount and gifts provided by suppliers during the procurement negotiation process, they should be reflected in the procurement contract in principle. For situations where there is no contract or cannot be reflected in the contract, the gift should also be considered as an asset of the Company, rather than a personal gift for employees participating in negotiations.

7.3 Interactions with potential customers and clients

and honest employment will prevent suppliers from participating in bidding and will be blacklisted in case of any violations.

10 Procedures for handling breaches

The Company has established procedures for handling corruption related clues. It accepts and registers reported matters, conducts timely independent verification and follow up work, and strictly implements the recusal system. The specialized department responsible for anti corruption work (General Office of the Commission for Discipline Inspection) shall propose disposition opinions on received corruption related clues, carry out verification and evidence collection, and draw conclusions. Where employees are found to have violated the aforesaid requirements, the conclusions shall be submitted to the competent authority for deliberation to decide on handling and corrective measures. Corresponding sanctions shall be imposed based on the nature and severity of incidents. Rectification shall be implemented with ongoing follow up and feedback to achieve closed loop management for the handling of corruption related clues.

In addition, employees of the Company and any other persons having dealings with the Company (including but not limited to customers, suppliers, etc.) may make complaints or reports to the Audit Committee of the Company's Board of Directors regarding fraudulent matters and any improper conduct that may occur in relation to accounting, risk management, internal controls, or other aspects.