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CEO's Message

Shandong Linglong Tire Co., Ltd. (hereinafter referred to as "Linglong Tire") is committed to upholding the highest standards of business ethics in all business activities to ensure that the company's operations are legal, fair, honest and trustworthy, and to actively fulfill its social responsibilities. Linglong Tire will conduct business cooperation in accordance with the principle of good faith, abide by all contract terms and relevant laws and regulations, will not conceal important information in commercial transactions, and will not engage in false propaganda and fraudulent acts.

Linglong Tire's Code of Business Ethics can help every employee fulfill their core obligations in terms of business ethics. It serves as the primary reference guide for all of Linglong Tire's core business policies, reinforces the shared responsibility of Linglong Tire for legal and ethical operation, and supports Linglong Tire's efforts in responsible and sustainable operations.

Thank you for reviewing the Code of Business Ethics, which provides ongoing guidance and direction for the values, principles and expectations of our operations. Please ensure that you read, understand and comply with its content in daily business. All employees of Linglong Tire shall actively participate in the construction of the business ethics management system, and the senior management will also lead by example and share best practices. If you have any questions, suggestions about the Code of Business Ethics or wish to report acts in violation of it, please contact us. Courageous reporting is crucial to safeguarding our corporate culture.

Preface

Corporate Culture and Philosophy

In the ever-changing global market full of opportunities and challenges, Linglong Tire has always adhered to the persistent pursuit of excellent quality, deep care for talent development, and conscious commitment to social and environmental responsibilities, and has gradually condensed a unique corporate culture and philosophy. We not only strive for excellence in technology and management, but also are committed to balancing economic benefits and social values to achieve the sustainable development of the enterprise and society.

Corporate Culture and Philosophy	
Vision	To become a technology-driven tire manufacturing enterprise with world-class technological excellence, world-class management standards and world-class brand influence
Values	Create opportunities for employees, create value for customers, generate profits for shareholders, and create wealth for society
Mission	Care for the society, serve the country through the industry
Social Responsibility	Carry forward the legacy of Linglong, jointly build a better society

Code of Business Ethics

To realize our vision, practice corporate values and mission, and actively fulfill social responsibilities, we have formulated this Code of Business Ethics to help and guide all employees and partners to make the best choices in line with ethical and compliance requirements in business exchanges, and to ensure that we act in accordance with corporate culture and philosophy.

Through clear behavioral principles and practical cases, this Code provides behavioral guidelines among various stakeholders from three main chapters: Company and Employees, Company and Market, and Company and Society, helping everyone make decisions in daily work that are lawful, honest and respectful of stakeholder interests.

Chapter	Primary Applicable Parties	Overview
Company	Senior	Protection of life, safety and health; respect for

and Employees	management and all employees	personal dignity and human rights; safeguarding of company assets and reputation; conflicts of interest; prohibition of insider trading and improper securities trading.
Company and Market	Customers, suppliers, distributors, government officials	Product quality and consumer health; anti-bribery and anti-corruption; fair competition and anti-monopoly; compliance of advertising and promotions; adherence to export control and international trade rules; compliance of foreign exchange and financial activities; tax compliance and internal control; protection of intellectual property rights and trade secrets; data and privacy protection; information disclosure and transparent governance; supply chain compliance management; regulation of government transaction conduct.
Company and Society	Communities, governments, the public, non- governmental organizations	Commitment to environmental protection and sustainable development; political neutrality and compliant participation in political activities; support for charity and public welfare; respect and promotion of human rights; promotion of integrated development and community symbiosis in the located areas.

Code of Business Ethics

Chapter 1 General Provisions

Article 1 Scope of Application

To address potential business ethics dilemmas in corporate business activities and guide employees and partners to make and implement sound and ethical decisions, this Code of Business Ethics (hereinafter referred to as "this Code") is specially formulated:

This Code applies to all employees of Linglong Tire and all its subsidiaries and branch companies (hereinafter referred to as the "Company").

The Company and its partners shall comply with this Code when conducting all business activities.

Article 2 Compliance with Laws

Compliance with laws is the basic principle of this Code. The Company adheres to lawful and compliant operation, and the Company and its partners must abide by laws and regulations of the countries where they operate and international rules:

1. For matters not clearly stipulated in this Code, laws shall be the criterion to ensure that all acts are legal and compliant.
2. In case of inconsistency between this Code and laws, the stricter provisions of the laws or this Code shall prevail.

Article 3 Consultation and Reporting

The Company encourages employees and partners to proactively consult or report when encountering questions regarding ethical, compliance and legal risks to ensure that business operations are legal, fair and honest:

1. When having doubts about the ethicality, compliance or legal risks of an act, employees and partners may consult their direct superiors, relevant functional departments or the hotline channels set up by the Company.

2. If actual or potential improper acts are found or reasonably suspected in the Company's own business or supply chain, they must be reported immediately through the Company's reporting mechanism.

Article 4 Protection of Whistleblowers

The Company undertakes to protect the safety of whistleblowers, ensure professional and fair investigations, and oppose any form of retaliation:

1. Investigations into reported matters shall be conducted by assigned personnel through dedicated reporting lines with strict confidentiality to ensure the professionalism and impartiality of the investigations.

2.No person is allowed to search for or disclose whistleblowers' information, interfere with the normal reporting procedure, force whistleblowers to withdraw reports, or take any form of retaliation due to reporting acts.

3.Once retaliation is discovered, the Company will impose disciplinary penalties according to the severity of the case; in particularly serious cases, the case will be transferred to judicial organs for handling in accordance with the law.

4.If the reported matter involves major illegal acts, the Company will report to the relevant law enforcement organs in accordance with the law,while ensuring the whistleblower's safety.

Article 5 Training and Continuous Improvement

The Company establishes and improves a business ethics training mechanism to enhance employees' compliance awareness and moral judgment, and continuously improves relevant systems:

1.Business ethics-related training shall be regularly conducted for all employees and shall be an important part of the induction training for new employees.

2.Special training on anti-bribery, anti-corruption and compliance management shall be provided for employees in key compliance positions such as marketing, procurement and bidding. Employees who have not received relevant training and passed the assessment shall not engage in relevant business activities.

3.The Company's management and relevant departments shall cooperate and organize training to assist employees in understanding and implementing this Code.

4.The Company will continuously improve this Code and relevant

systems according to business development, employee feedback and external regulatory requirements, and promptly communicate the improved content to employees and partners as necessary.

Chapter 2 Company and Employees

Article 6 Protection of Life Safety and Health

The Company is committed to maintaining a safe and healthy workplace and protecting employees' life safety and occupational health:

1.Strictly abide by national and industrial safety laws, regulations and standards, improve safety management systems and protective facilities, conduct regular training and drills, promptly identify and rectify hazard sources, and prevent work-related injuries and accidents.

2.Regularly identify and monitor occupational hazard factors such as chemical and physical factors in the workplace, conduct risk assessments, equip with necessary personal protective equipment, and ensure that the working environment meets occupational health requirements.

3.Establish an employee health support system including regular physical examinations, medical services and psychological counseling, provide support policies such as return-to-work after sick leave and parental leave, and advocate a healthy lifestyle and corporate health culture.

4.The use, possession, transfer or sale of illegal drugs and alcohol is prohibited during working hours and in the workplace. The Company may conduct tests in accordance with the law and impose disciplinary penalties on violators.

5.Zero tolerance for any form of violence, intimidation or threat, and the carrying of any weapons is prohibited.

Article 7 Respect for Personal Dignity

The Company is committed to creating a diverse, fair, non-discriminatory, harassment-free and privacy-respecting working environment, and protecting the personal dignity and legitimate rights and interests of each employee:

1.Encourage diversity and inclusion, embrace backgrounds of different genders, ages, ethnic groups, religions, sexual orientations, gender identities, disabilities, etc., and create a collaborative and inclusive workplace

atmosphere.

2. Adhere to fair labor practices; opportunities for compensation, promotion, training, etc. are based on job requirements and performance, without differential treatment due to personal characteristics; conduct regular audits to ensure fairness.

3. Harassment is strictly prohibited, including abuse of authority, sexual harassment and insulting words and deeds based on any legally protected characteristics; zero tolerance for harassment acts is implemented.

4. Respect privacy; employees' personal information shall only be used within the statutory or business-necessary purposes, and shall not be inquired, copied or forwarded without authorization.

Article 8 Protection of Company Assets and Reputation

Employees shall adhere to the principle of protecting company assets and safeguarding company reputation, and exercise a high degree of caution in information communication and business activities:

1. Strictly perform confidentiality obligations and shall not disclose or abuse the Company's confidential and sensitive information.

2. Use cautious words in written, oral and online communication, and do not publish or forward any content that may damage the Company's reputation, infringe on the Company's rights and interests or disclose internal information.

3. Without authorization, no one may speak on behalf of the Company, accept interviews or make comments involving the Company's affairs to the outside.

4. Reasonably use and properly safeguard the Company's assets such as funds, equipment and intellectual property rights, and the private use, abuse or unauthorized disposal of such assets is prohibited.

5. All company assets shall be returned upon resignation, and the confidentiality obligation shall continue to apply.

Article 9 Conflict of Interest

Employees shall prioritize the overall interests of the Company, avoid influencing or potentially affecting their objective performance of duties and fair

decision-making due to personal, family or other associated relationships, and ensure the independence and integrity of the Company's business operations:

1. Shall not participate in personnel decision-making, management supervision or business arrangements or related activities related to oneself, close relatives or other persons with close economic relations.

2. Without the written approval of the Company, shall not take part-time jobs outside, hold management positions or engage in investment activities that have actual or potential competitive relationships with the Company's business.

3. Shall not use the Company's property, information or position to facilitate transactions for oneself or related parties, or seek, transfer or conceal any improper interests.

4. In case of matters involving conflicts of interest with oneself or related parties, or situations that may arouse reasonable doubts and affect the fair performance of duties even without substantive conflicts, employees shall take the initiative to declare to the Company and avoid relevant decision-making or business activities in accordance with the rules.

Article 10 Prohibition of Improper Securities Trading

Employees shall not engage in improper securities trading such as insider trading and short selling of the Company's securities, be loyal to professional ethics, and ensure the impartiality and transparency of transactions:

1. Shall not disclose, disseminate or use inside information of the Company and its partners to conduct securities trading.

2. Shall not allow family members or associated persons to conduct securities trading by obtaining inside information, which shall be deemed as the employee's own act.

3. Shall not hold the Company's securities in margin accounts or use the Company's securities as collateral for loans.

4. Shall not engage in unethical securities trading acts on the Company's securities such as short selling, hedging or short-term speculative trading.

Chapter 3 Company and Market

Section 1 Honest Market and Fair Competition

Article 11 Product Quality and Consumer Health and Safety

The Company always regards product quality and consumer health and safety as its primary responsibility, strictly abides by industry standards and legal provisions, and ensures that all products and services are quality-compliant, safe and reliable in all stages such as design, production, sales and after-sales service:

1.Strictly implement product standards and quality certification norms of various countries to ensure that all products are legal and compliant in terms of design, manufacturing, inspection, marking, transportation, instructions for use, etc.

2.Shall not lower quality standards to save costs or shorten production cycles; acts such as adulteration, concealing defects, false marking or forging test results are strictly prohibited.

3.Employees are responsible for strictly following the Company's quality control processes; if a product is found to deviate from quality standards and may endanger consumer health and safety, they shall immediately report to their superiors or the quality management department.

4.The Company establishes and improves a product recall mechanism. If potential safety hazards are found in products, the Company will take the initiative to assess the risks and perform reporting and recall obligations in accordance with the law.

Article 12 Anti-Bribery and Anti-Corruption

The Company has established an ISO 37001 anti-corruption and anti-bribery system, and strictly abides by the anti-bribery and anti-corruption laws and regulations of various countries to ensure the transparency, impartiality and compliance of all business activities, and prohibits any form of bribery and corruption:

1.Strictly implement all systems of the Company's anti-corruption and anti-bribery system and conduct business activities within the scope of institutional constraints;

2.Shall not solicit, accept or provide bribes to third parties, government organs and other organizations, ensure that all business acts are fair and transparent, and maintain a fair competition environment.

3.Appropriate gifts, business banquets and catering that conform to commercial practices may not be deemed as bribery with the Company's prior approval and filing, but shall not exceed the scope of normal social communication and shall not have improper purposes.

Article 13 Fair Competition and Anti-Monopoly

The Company strictly abides by the anti-monopoly and anti-unfair competition laws and regulations of various countries, maintains a fair, open and healthy market environment, and prohibits any acts that disrupt the market order and engage in unfair competition:

1.Shall not engage in acts that disrupt the domestic and foreign market order such as commercial bribery, dumping and illegal subsidies.

2.Shall not engage in acts that damage the legitimate rights and interests of other market entities and consumers such as false propaganda, commercial defamation, infringement of trade secrets, market confusion and illegal prize sales.

3.Shall not enter into monopoly agreements that restrict competition with other competitors such as price manipulation, market division, boycotts and restricted transactions.

4.Shall not engage in acts that eliminate or restrict competition such as differential treatment, refusal to trade, tying and bundled sales through concentration of undertakings or abuse of dominant market position.

Article 14 Compliance of Advertising and Other Marketing Promotions

The Company adheres to the advertising principles of truthfulness, accuracy and completeness, conveys positive and healthy values, abides by social morality and ethical norms, and opposes any disseminating practices that are misleading, false or harmful to social public interests:

1.Promotional content must be true, accurate and complete; information such as product descriptions, performance, prices and uses shall be based on

sufficient factual evidence; false advertising, misleading statements or publication of content prohibited by law are not allowed.

2. Convey positive and healthy values and abide by social morality and ethical norms; shall not attract attention through improper means such as discriminatory, insulting, violent and vulgar means, or harm public emotions, personal dignity or social norms by using major social events, disasters, sensitive historical themes, the name of state organs, etc.

3. Shall not damage the commercial reputation or legitimate interests of other market entities by means of vilification, belittlement, misleading comparison, etc.

4. Employees shall also follow the above principles when publishing company-related content through unofficial channels such as social media to avoid affecting the Company's reputation and compliance.

Section 2 International Trade and Financial Compliance

Article 15 Export Administration and International Trade Compliance

The Company abides by the applicable laws and regulations of various countries on import and export control, economic sanctions and cross-border transactions to ensure that international trade activities are true, legal and controllable:

1. Cross-border transactions shall truthfully declare goods, amounts, end uses and final destinations, and shall not fabricate trade backgrounds, falsely report information or use third parties to cover up the essence of transactions.

2. Shall not provide goods, technologies or services to sanctioned countries and regions, or individuals and organizations on the sanction list; shall not evade export restrictions through re-export, distribution, transshipment and other means.

3. For transactions where products may be used in sensitive contexts such as military vehicles and special equipment, the awareness of risk identification shall be raised to guard against export control and sanction risks.

4. Necessary compliance due diligence shall be conducted before

transactions to identify the background of partners, the end users and end uses of products, and avoid indirectly supplying products or services to sensitive fields or restricted parties through third parties.

Article 16 Foreign Exchange and Financial Compliance

The Company abides by the foreign exchange management and financial supervision rules of various countries to ensure that capital flows are legal and transparent, guard against financial risks, and oppose any form of money laundering:

1. Shall not evade foreign exchange control through false contracts, split transactions or third-party accounts, and truthfully declare the purpose and amount of transactions.

2. Oppose any form of money laundering or unclear capital transactions, and be alert to suspicious signs such as abnormal capital sources, complex payment paths and vague transaction party information.

3. Do not invest in high-risk, unethical or non-transparent financial products; overseas investments must comply with the laws and regulations of the target countries and avoid involvement in sensitive projects in sanctioned countries or regions.

Article 17 Tax Compliance and Internal Control

The Company pays taxes in accordance with the law worldwide, puts an end to illegal acts such as tax evasion and false declaration, and continuously improves accounting records and internal audit mechanisms:

1. Strictly abide by the tax laws and regulations of various countries and international rules, declare truthfully and pay taxes in full on schedule; shall not evade tax burdens or transfer profits through means such as false transactions, offshore tax avoidance and transfer pricing manipulation.

2. All account books, statements and financial records shall accurately reflect the substance of business, strictly implement accounting standards and internal control policies, and shall not conceal, forge or fabricate transactions.

3. Shall not set up undisclosed accounts or capital pools, and shall not delete, alter or prematurely destroy documents and records within the legal retention period.

4. Employees shall cooperate with internal or external audits, provide complete, true and timely information, and shall not intentionally delay, conceal or mislead.

Section 3 Data, Privacy and Intellectual Property Rights

Article 18 Protection of Trade Secrets and Intellectual Property Rights

The Company is committed to protecting the trade secrets and intellectual property rights of itself and its partners, respecting legitimate rights and interests, clarifying the attribution of rights and responsibilities, and preventing information leakage, abuse of rights and improper acquisition:

1. Employees shall strictly keep confidential the trade secrets and intellectual property information of the Company and its partners accessed in work, including but not limited to technologies, data, plans, designs, etc., and shall not disclose, use or authorize others to use them without permission whether during employment or after resignation.

2. The relevant rights of service intellectual achievements such as patents and works created by employees in the performance of their duties shall generally belong to the Company. The Company respects employees' right of signature in accordance with the law and gives reasonable rewards in accordance with internal systems to encourage innovation.

3. The Company prohibits the infringement of the intellectual property rights or trade secrets of any third party, and shall not obtain others' protected information or technologies through illegal and improper means such as theft, inducement and reuse of former employers' information.

4. The Company registers and maintains its own intangible assets such as patents, trademarks and copyrights in accordance with the law; intellectual property rights jointly held with others shall be jointly managed and reasonably used in accordance with cooperation agreements, and the legitimate rights and interests of the other party shall be respected.

Article 19 Data and Privacy Protection

The Company attaches great importance to the data and privacy security of employees, customers and partners, strictly abides by relevant laws and

regulations, and ensures the safe and compliant collection, use, transmission and storage of information:

1.The Company collects and uses employees' personal information only within the necessary scope of performing management duties, and shall not use the relevant information for non-work purposes without authorization.

2.Customers' personal information, transaction data and other information shall only be used for the performance of contracts and provision of services, and shall not be disclosed to third parties without permission.

3.The Company shall properly safeguard the commercial and technical data known by partners in business, and prohibit seeking personal gains by using or disclosing such information.

4.In case of cross-border data transmission, the Company shall perform the obligations of assessment, filing and signing compliance agreements in accordance with the law to ensure data security and compliance.

5.Employees shall not access, copy, forward or delete company data without authorization, and shall follow the "minimum necessary" principle to avoid information leakage caused by abuse of authority or system vulnerabilities.

Article 20 Company's Information Disclosure Obligations and Governance Transparency

As a public company listed on the Shanghai Stock Exchange in China, the Company strictly performs its information disclosure obligations stipulated by laws and regulatory requirements, improves the transparency of corporate governance, and protects the public's right to know:

1.Strictly abide by the relevant provisions on information disclosure in securities supervision and other laws and regulations, disclose major matters such as connected transactions, major investments and financial data in a timely, true, accurate and complete manner, and prohibit the disclosure of inside information before legal disclosure.

2.Promote the openness and transparency of the corporate governance mechanism, take the initiative to disclose the composition of management, division of responsibilities, decision-making procedures, internal control and

audit arrangements, and respond to the concerns of investors and the public about the legitimacy of governance and the performance of responsibilities.

3.Establish an information disclosure affairs management mechanism, where authorized personnel release information to the outside on behalf of the Company; unauthorized employees shall not disclose or comment on the Company's operation, finance, strategy and other relevant matters without permission.

Section 4 Partner Management

Article 21 Supply Chain Management

The Company adheres to the legal, fair and transparent procurement principles in its global business, strengthens the compliance management and performance of responsibilities of the supply chain, and builds a sustainable and responsible business cooperation relationship:

1.Procurement activities shall comply with applicable laws and regulations and the Company's internal systems; supplier selection shall be conducted in an open and fair manner, and under-the-table transactions, favoritism and conflicts of interest shall be put to an end.

2.Select suppliers on the basis of merit according to standards such as quality, price, service, delivery capacity, reputation and compliance performance; contracts shall clearly specify the responsibilities of both parties, deliverables and compliance requirements.

3.Partners shall abide by business ethics and legal obligations; it is strictly prohibited to obtain orders by improper means or engage in acts in violation of this Code such as infringement of intellectual property rights, use of child labor and environmental damage.

4.According to risk levels, the Company may conduct background investigations or compliance reviews on suppliers in accordance with the law, and may suspend cooperation with those with major compliance risks, lack of social responsibilities or reputation risks.

5.Employees shall not recommend, endorse or approve third-party products, services or entities in the name of the Company without permission; matters involving supplier promotion, authorization, co-branding, etc. must be

approved through an authorization procedure.

Article 22 Government Officials and Government Transactions

When conducting business with government organs, public officials and their affiliated entities, the Company shall abide by the principles of honesty, law-abiding and traceability, and prudently manage compliance and reputation risks, especially in links involving public resources, approval matters and bidding and tendering:

1. For matters involving government procurement, project cooperation, administrative approval or financial support, the applicable rules shall be accurately understood, procedures such as bidding and tendering, public announcement and evaluation shall be strictly observed, and improper acts such as bid rigging, false statements and evasion of compliance processes are prohibited.

2. Shall not obey or execute any improper instructions issued by government officials, public officials or their representatives that conflict with laws and regulations or the Company's policies; if necessary, the matter shall be escalated to the Company's management or compliance department in a timely manner.

3. In government-related transactions, the completeness, truthfulness and traceability of transaction documents, communication records and payment vouchers shall be ensured, and relevant information shall not be forged, concealed or misleading.

4. When contacting and cooperating with the government through agents, consultants, intermediaries or other third parties, sufficient due diligence must be conducted and their scope of responsibility shall be clarified to prevent them from becoming channels for interest transfer or evasion of responsibilities.

5. Government receptions, official activities, meeting support and other events organized or participated in by the Company must strictly abide by the Company's systems and relevant legal provisions, be approved in accordance with the law and recorded truthfully to ensure transparency and controllability.

Note: In case of providing property, courtesies or other benefits to government officials or their relevant personnel, please also refer to the

provisions of Article 12 Anti-Bribery and Anti-Corruption for implementation to ensure that the acts are legal and compliant, with legitimate purposes and complete procedures.

Chapter 4 Company and Society

Article 23 Environmental Commitment and Sustainable Development

Adhere to the concept of green development, minimize the negative impact of business activities on the environment, fulfill the responsibilities of resource conservation, pollution prevention and control, and ecological protection, and promote sustainable development:

1. Strictly abide by applicable environmental laws and regulations, establish and improve an environmental management system, conduct environmental impact assessments, ensure that links such as production, procurement and supply chain are legal and compliant, and continuously improve environmental performance.

2. Take effective measures to reduce emissions of waste gas, wastewater, solid waste and noise, prevent the leakage of harmful substances, promote the application of pollution prevention and control technologies, reduce environmental risks, and protect the safety of the surrounding ecology and communities.

3. Reasonably utilize resources such as water, electricity and fuel, promote energy conservation, emission reduction and resource recycling, actively control the carbon footprint, and support actions and goals related to addressing climate change.

4. Protect the ecological environment, respect land, water bodies and biodiversity, prevent the destruction of ecosystems, promote green design and clean production, and realize the harmonious coexistence of business and the environment.

5. Establish an environmental information management and disclosure mechanism to ensure the truthfulness and completeness of environmental data, promote transparent communication, and continuously improve relevant systems and operating norms for environmental protection.

Article 24 Political Activities

The Company adheres to political neutrality, respects the right of employees to participate in political activities in accordance with the law as individuals, and at the same time clarifies the behavioral boundaries of the Company and employees in political-related matters to prevent conflicts of interest, abuse of resources and misleading of public positions:

1.Shall not provide funds, materials, services or conveniences to political parties, candidates, political organizations or relevant activities in any form, nor conduct disguised donations through third parties.

2.Employees' participation in political activities must be conducted in their personal capacity, outside working hours and without using company resources; they shall not express political positions or comments to the outside in the name of the Company or affiliated enterprises, nor imply or cause misunderstandings that they represent the Company's position.

3.If an employee intends to run for election, accept a political position or hold a public office such as a government consultant, he/she shall declare truthfully in advance, evaluate the potential impact on job responsibilities, and may hold a concurrent post only after the Company's assessment.

Article 25 Charitable Activities

The Company encourages participation in public welfare and charity in a legal and transparent manner to fulfill corporate social responsibilities. All donation activities shall follow the principles of truthfulness, voluntariness, legitimate purposes and compliant procedures, and it is strictly prohibited to engage in improper acts in the name of charity.

1.All charitable donations made in the name of the Company shall have clear public welfare purposes and be limited to non-profit organizations or institutions established in accordance with the law; no charitable donation of any form shall be promised, initiated or implemented without approval.

2.It is prohibited to use charitable donations as a means to obtain business opportunities, seek improper interests or influence decision-making, and shall not accept any administrative conveniences or policy support conditional on donations.

3.Charitable acts shall not cover up political donations, interest transfer, connected transactions or other acts in violation of the integrity obligation, and in particular, direct or indirect associations with government projects, approval matters or public officials shall be avoided.

4.A review, record-keeping and audit mechanism for charitable donations shall be established to ensure that all relevant materials are true, complete and traceable, and the necessary information disclosure shall be performed in accordance with the Company's systems.

5.Employees' participation in personal charitable activities shall be conducted in their private capacity, and shall not use the Company's name, resources or positional advantages without permission. If intending to participate on behalf of the Company, authorization shall be obtained in advance and the provisions of this Article shall be followed.

Article 26 Human Rights Commitment

The Company undertakes to respect and protect basic human rights in its operations and business relations:

1.Shall not participate in any human rights-violating acts in products, services, investments or cooperation, including forced labor, child labor, human trafficking or other forms of oppression.

2.Shall not establish or maintain cooperative relations with organizations, individuals or suppliers with serious human rights problems.

3.For matters involving land acquisition, resettlement, ethnic minorities, forced labor or other human rights-sensitive issues, the relevant parties shall be fully informed and their genuine consent shall be obtained, and such sensitive issues shall be disclosed in a timely manner.

4.If a partner is verified to have committed major human rights infringement acts, the procedure for terminating cooperation shall be initiated immediately and the partner shall be included in the compliance blacklist.

5.The Company carries out human rights due diligence and response measures relying on the compliance mechanism, and clarifies the processes of identification, assessment, reporting and rectification.

Article 27 Regional Integration and Community Symbiosis

Respect the social and cultural background of the located areas, promote the coordinated development of corporate operations and local communities, and establish a sustainable relationship of mutual trust and integration:

1. Respect local customs, cultural traditions and religious beliefs, and avoid cultural offense, misunderstanding or adverse effects on the community due to corporate acts, remarks or publicity methods.

2. Pay attention to situations such as project site selection, construction and expansion that may have a major impact on the community's ecology, historical heritage or daily life, assess risks in accordance with the law, and properly handle issues related to the protection of cultural sites and residents' rights.

3. During local operation, take the initiative to maintain communication with the community, understand its reasonable concerns, appropriately absorb local employment, support education, skills training and social public welfare, and respond to the community's expectations with practical actions.

4. Shall not use community relations as a means to obtain improper interests, administrative conveniences or commercial influence; any community-related activities shall be legal and compliant, with clear purposes and open transparency, and shall not cover up political, commercial or other non-public welfare purposes.

Chapter 5 Supervision and Penalties

Article 28 Responsible Entities

1. The Company's board of directors and management bear the ultimate responsibility for the construction and implementation of the business ethics system, and coordinate the value orientation, institutional guarantee and resource allocation.

2. The "responsibility listing" system is implemented for business ethics management; each functional department shall, in accordance with the division of responsibilities in the list, take the initiative to identify ethical and compliance risks in business activities, implement corresponding management measures, and be responsible for the results.

3. Establish a full-time institution to coordinate the management and

supervision of business ethics, maintain appropriate independence and professionalism, and ensure the continuous improvement of the system.

4.The Company establishes a responsibility division mechanism to ensure that relevant management requirements are specifically implemented in all departments and business links, and promote the assignment of responsibilities to individuals and the formation of a closed-loop management system.

Article 29 Penalties and Accountability

Acts in violation of this Code shall bear corresponding responsibilities according to the severity of the circumstances. The Company reserves the right to take all necessary measures such as disciplinary penalties, commercial actions and legal accountability, and initiate remedial and rectification procedures for serious cases:

1.For internal employees, disciplinary measures such as re-training, warning,notice of criticism, assessment, suspension and even termination of labor contracts may be taken according to the nature and impact of the violation; those suspected of illegal or criminal acts shall be transferred to the competent authorities for handling in accordance with the law.

2.For external entities such as business partners and cooperators, if they have committed major ethical or compliance violations, the Company may remove them from the compliance cooperation list, terminate contracts and business relations, and withdraw from relevant investments if necessary.

3.Mitigated punishment may be given in the following circumstances: (1) Voluntarily confessing violations of rules and disciplines; (2) Taking timely measures to eliminate adverse effects or effectively avoiding (recovering) losses; (3) Reporting and exposing others' serious violations of rules and disciplines, which are verified to be true.

4.Aggravated punishment shall be given in the following circumstances: (1) Forcing, instigating or threatening others to violate rules and disciplines; (2) Refusing to correct mistakes, refusing to compensate for economic losses or return illegal gains from violations; (3) Violating rules and disciplines repeatedly.

Article 30 Appeal and Review Mechanism

Individuals or entities that have been subject to disciplinary or other handling measures for violating this Code have the right to file an appeal or review application within the prescribed time limit. The Company encourages the rational expression of objections and protects the right to appeal from interference or retaliation:

1.Appeals shall be filed through designated channels, and the content shall include basic facts, explanations of reasons and the requested handling results.

2.The Company shall conduct a review in accordance with the division of responsibilities, ensure the impartiality and transparency of the handling process, and give a reply within a reasonable time limit.

3.For appeal matters with sufficient factual basis, obviously improper handling or procedural defects, the Company shall make corrections or adjustments, and take corresponding remedial measures as appropriate.

4.For major disciplinary decisions, the appellant may apply for a review to the management, which shall organize the review procedure, and the review conclusion shall be the final handling opinion.

Article 31 Record-Keeping and Tracking

The Company establishes a record-keeping and audit mechanism for violations and trade compliance, and improves management transparency and accountability efficiency through registration, tracking and a closed-loop rectification process:

1.The Party Building Office is responsible for registering the violations of employees or partners, and the Supervision Office is responsible for verification, investigation coordination and rectification supervision, and urges the relevant responsible entities to complete rectification and submit reports within the prescribed time limit to form a closed-loop management.

2.Each business department of the Company is responsible for collecting, sorting out and filing relevant records involving business ethics and trade compliance in daily business activities for a retention period of not less than five years, ensuring that the records are true, accurate, clear and

traceable.

3. Archived records include but are not limited to: contract documents, transaction vouchers, customer or supplier information, compliance review materials, communications, license documents, customs declaration materials, audit results, government correspondence, etc.

4. The Company verifies the implementation of compliance processes through regular internal audits and other means, records and feeds back identified problems and promotes rectification to ensure the effective operation of the management mechanism.