Grandblue Environment Co., Ltd.

Compliance Manual

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Preface

To strengthen comprehensive risk management across Grandblue Environment Co., Ltd. (hereinafter referred to as the “Company”) and its affiliated enterprises, this *Compliance Manual* (hereinafter referred to as the “Manual”) has been developed. It is intended to enhance legal and regulatory compliance in business operations and to support the Company's integrated “Four-in-One” management framework, which combines risk control, internal control, compliance, and legal affairs. This Manual serves as a practical guide for employees, helping them perform their duties in accordance with standardized procedures and enhanced compliance standards. By doing so, employees contribute to safeguarding the Company's reputation and public image, and to promoting its sustained, healthy, and high-quality development.

This Manual applies directly to the Company and its wholly owned and controlled subsidiaries (hereinafter referred to as “Affiliated Enterprises”). Companies in which the Company holds equity stakes should refer to this Manual for guidance.

The Company encourages employees to report any potential violations of laws, regulations, or internal policies. All reports should be made in good faith. Fabrication of false allegations or retaliation against

individuals who report concerns is strictly prohibited. Employees may submit reports via phone, email, or other approved channels. The Company will investigate all reports, communicate the results, and protect the identity of whistleblowers.

Reporting Department: Legal and Compliance Department

Email: flhgb@grandblue.cn

Mailing Address: Legal and Compliance Department, Grandblue Environment Co., Ltd., Grandblue Plaza, No.23 Ronghe Road, Guicheng Street, Nanhai District, Foshan, Guangdong Province

Chapter I General Provisions

Section 1: Definitions

Article 1 Risk refers to the impact of future uncertainty on the Company's ability to achieve its business objectives. Company risks may include strategic, market, financial, legal and compliance, and operational risks. Risks can be categorized as either pure risks (with potential for loss only) or opportunity risks (which may also offer potential gains).

Article 2 Comprehensive Risk Management refers to the Company's approach to identifying, assessing, and managing risks across all business units and management functions. It includes promoting a strong risk-aware culture and implementing a structured framework that includes strategies, control mechanisms, organizational structures, information systems, and internal controls. This approach provides reasonable assurance that the Company’s risk management objectives will be achieved.

Article 3 Internal Control refers to the processes implemented by the Company's board of directors, management, and employees to ensure achievement of business objectives.

Article 4 Compliance means that the Company's operations and employees adhere to applicable laws and regulations, regulatory

requirements, industry standards, International Treaties, the Company's articles of Association, and internal rules and policies.

Article 5 Legal and Compliance Risk refers to the potential for legal liability, financial loss, reputational damage, or other negative consequences arising from non-compliance or violations during business operations.

Article 6 Compliance Management involves the systematic and planned efforts by the Company to prevent and mitigate legal and compliance risks. These efforts include establishing compliance systems, improving operational procedures, fostering a culture of compliance, and strengthening oversight and accountability, all with a focus on lawful business conduct and ethical employee behavior.

Section 2: Policy and Core Principles

Article 7 The Company adopts a "Four-in-One" management policy, which consists of the following core principles: Precise Identification, Coordinated Efficiency, Adherence to Baseline Standards, and Value Creation.

(1) Precise Identification: the Company accurately identifies material risks by thoroughly examining its obligations and risks. This principle forms the foundation of all risk management activities.

(2) Coordinated Efficiency: The Company ensures that the three lines of defense, business units, risk management and compliance

functions, work together efficiently and collaboratively. This coordination is both a fundamental approach and a critical requirement of the "Four-in-One" management framework.

(3) Adherence to Baseline Standards: The Company prioritizes compliance with regulatory and operational baseline standards before pursuing "Value Creation". This principle reflects the understanding that sustainable value must be built on a foundation of safety and integrity, not through risky or speculative behavior. Upholding these standards is essential to maintaining stable and long-term growth.

(4) Value Creation: Value creation is the ultimate goal of the "Four-in-One" framework. The Company achieves this by rigorously implementing, operating, and continuously improving its management systems. These efforts ensure both the protection of core interests and the realization of long-term strategic objectives.

Section 3: Objectives and Direction

Article 8 Grandblue Environment is committed to building a "Four-in-One" management framework that integrates risk control, internal control, compliance, and legal affairs. The Company promotes and consistently applies the risk control policy of "Precise Identification, Coordinated Efficiency, Adherence to Baseline Standards, and Value Creation" across all levels of the organization. By establishing an effective system for identifying, scientifically evaluating, and efficiently

managing risks, the Company aims to ensure lawful and compliant business operations, effectively prevent and mitigate risks, enhance management execution and process control, foster continuous innovation and operational efficiency, protect and strengthen its brand reputation and corporate value, and support the long-term strategic goal of becoming the Most Trusted Eco-Environmental Service Enterprise.

Article 9 The Company's "Four-in-One" management framework is structured with risk management as its orientation, internal control as its focus, compliance management as its foundation, and legal affairs management as its support.

(1) Risk Management as Orientation: The "Four-in-One" management framework operates within a risk-based structure focused on risk identification, assessment, and prevention. Through a comprehensive risk management process, including risk identification, assessment, strategy development, solution implementation, and ongoing monitoring, the framework provides the objectives for internal control and compliance management, and essential inputs for legal affairs.

(2) Internal Control as Focus: The framework emphasizes internal control by establishing robust systems that align with the requirements of risk, compliance, and legal management. This includes building an internal control system that integrates with the "Four-in-One" approach

and ensures alignment with company-wide risk and compliance standards.

(3) Compliance Management as Foundation: Compliance management forms the baseline of the “Four-in-One” framework. It requires the Company to internalize external laws, regulations, and standards, thereby establishing a legal and operational foundation for internal control. As compliance management is embedded in day-to-day operations, internal controls are essential to ensure effective implementation and enforcement of compliance policies.

(4) Legal Affairs Management as Support: Legal affairs management supports the framework by providing risk identification, guidance, and dispute resolution through legal channels. This includes activities such as contract review, legal consultation, and resolution of legal disputes. Legal affairs play a critical role in identifying and managing legal and compliance risks, protecting the Company’s interests, and serving as a key mechanism for risk mitigation and strategic support.

Section 4: Philosophy and Values

Article 10 The Company's risk philosophy is “Risk and opportunity are dialectically interdependent; scientific management creates and safeguards value.”

All managers and employees must recognize the interconnected nature of risk and opportunity objectively. Risk should not be avoided

indiscriminately, nor acted upon aggressively. Instead, employees must apply scientific risk management principles and professional expertise to transform potential risks into drivers of development.

Article 11 The Company's risk control philosophy is “Managing business is managing risk; risk control must be integrated into business operations. The frontline is the gateway for risk management and professional capabilities must be deployed to the frontline.”

Business departments, as the closest to risk sources, play a critical role in proactively managing risks. However, while frontline teams are often most aware of emerging risks, they may lack the specialized expertise needed to manage them effectively. This requires active support from the second and third lines of defense, which provide professional capabilities, training and guidance. By working collaboratively, all three lines of defense can enhance frontline awareness and capability. This coordinated efficiency forms the foundation of the Company’s effective prevention and control model within the “Four-in-One” management framework.

Article 12 The Company's risk management values are Professional Collaboration; Integrity First; and Innovation and Transformation.

(1) Professional Collaboration: This value reflects both ambition and altruism within the domain of risk control. The “Four-in-One” framework begins with precise risk identification and assessment. To support this,

managers and employees at all levels must adopt a professional mindset, continuously strengthen their expertise, and proactively engage in cross-functional collaboration. Sharing individual knowledge and experience enable the Company to collectively manage risks more effectively.

(2) Integrity First: Employees must regard integrity, lawfulness, and compliance as foundational principles in their daily work. These values are rooted in a culture of accountability and ethical conduct. Sustained development depends on full adherence to legal and regulatory standards. The "Four-in-One" framework promotes high-quality growth that is never achieved at the expense of legal and regulatory compliance.

(3) Innovation and Transformation: The core objective of the "Four-in-One" framework is to mitigate risks while safeguarding and creating value. This value underscores the need for continuous adaptation and ambition. As external environments constantly evolve, so must the Company's organizational structures, systems, and tools. Continuous learning, innovation, and transformation are essential to ensuring that the risk control system remains effective and future-ready.

Chapter 2: Corporate Compliance Obligations

Section 1: Obligation to Comply with Laws

Article 13 The Company must conduct all business activities in strict accordance with applicable laws and Administrative Regulations. In doing so, it shall uphold social and business ethics, operate with integrity and good faith, accept government and public oversight, and actively fulfill its social responsibilities.

Section 2: Obligation to Govern Lawfully and Compliantly

Article 14 The Company shall strictly follow its Articles of Association and all relevant provisions related to corporate governance. It must: implement internal rules and regulations effectively, follow standardized procedures for decision-making, including the convening, conduct, and voting procedures, and complete all required preliminary reviews, including special agenda reviews and legal compliance reviews, to ensure that all corporate decisions comply with legal and regulatory requirements.

Article 15 The Company shall implement standardized authorization and approval processes. Special attention must be given when delegating the following eight categories of authority, which are closely related to legal and compliance risks: review authority; personnel authority; procurement authority; market, customer service, and sales authority;

release authority; measurement authority; financial and capital authority; and access to critical information.

Section 3: Information Disclosure Obligations

Article 16 In accordance with the *Company Law of the People's Republic of China* and other relevant regulations, the Company shall lawfully disclose information regarding its shareholders and actual controllers. All disclosures shall be truthful, accurate, and complete.

Article 17 In accordance with the *Securities Law of the People's Republic of China* and stock exchange regulations, the Company shall disclose key information about the Company's financial condition, operating results, material matters, and other information required by law or regulation in a timely, accurate, and complete manner.

Article 18 The Company shall ensure that all disclosed information is truthful, accurate, complete, concise, clear, easy to understand, free from false records, misleading statements, or material omissions.

Section 4: Anti-Monopoly Obligations

Article 19 The Company shall fully comply with the Antitrust Laws and Anti-Monopoly Regulations of all applicable jurisdictions in the course of its business activities. It shall adhere to the principles of fair competition, promote healthy market competition, and avoid engaging in or facilitating any form of monopolistic behavior.

Article 20 The Company shall not enter into agreements, formal, informal, or implied, with competitors or business partners that aim to manipulate market prices or restrict fair competition. Monopolistic agreements are classified into horizontal and vertical monopolistic agreements. Horizontal monopolistic agreements (between competitors), such as: price-fixing or price manipulation agreements, market division agreements, joint boycott agreements. Vertical monopolistic agreements (between different levels of the supply chain), such as agreements to fix resale prices and agreements to impose minimum resale prices. These agreements may be oral, written or established through concerted practices that result in coordinated market behavior.

Article 21 In any merger, acquisition, or transaction involving the purchase of companies, business units, or assets, the Company must comply with relevant national anti-monopoly laws and regulations on business concentration, and proactively seek regulatory review and guidance from the appropriate authorities if there is uncertainty regarding the legality or competitive impact of the transaction.

Section 5: Anti-Unfair Competition Obligations

Article 22 The Company shall strictly comply with the *Anti-Unfair Competition Law of the People's Republic of China*, the *Interim Provisions on Prohibiting Commercial Bribery*, and other applicable laws

and regulations. It shall actively uphold a fair, transparent, and orderly market environment.

Article 23 The Company strictly prohibits the following forms of unfair competition in all business activities:

(1) Counterfeiting: Using or imitating registered trademarks, certification marks, or well-known quality marks, or product trade dress without authorization; falsifying product origin or misusing marks that suggest quality or reputation; using similar names, packaging, or branding mislead consumers or damage competitors.

(2) False or Misleading Advertising: Making exaggerated or unsubstantiated claims about product quality, performance, services, or corporate reputation; misleading the public through advertising or promotional content.

(3) Bid Rigging. Colluding with other parties to manipulate bids, suppress fair competition, or distort pricing outcomes in tender processes.

(4) Commercial Bribery: Offering, accepting, or soliciting money, goods, or other benefits in exchange for business opportunities or other economic benefits.

(5) Infringement of Trade Secrets: Illegally acquiring, using, or disclosing confidential business information protected by law.

(6) Damaging Competitors' Business Reputation: Fabricating or spreading false information intended to damage competitors' credibility or public image.

(7) Other Prohibited Unfair Competition Practices: Engaging in any additional unfair business practices prohibited by applicable laws and regulations.

Section 6: Safety and Environmental Protection Obligations

Article 24 The Company shall strictly comply with all national laws and regulations related to workplace safety and environmental protection. It shall implement internal systems and procedures related to work safety, environmental protection, fire prevention and occupational health; strengthen supervision, inspection, enforcement mechanisms; and promptly identify and correct any violations or non-compliance.

Article 25 The Company shall promote the principles of scientific development, safe development, "red line" awareness, and a "zero accident" philosophy. To support this, it shall: establish and maintain a comprehensive Work Safety Accountability System; fulfill its primary responsibility for the safety of its operations; and exercise supervisory responsibility over its own operations and the safety practices of its Affiliated Entities. Each Affiliated Entity must assume primary responsibility for the safety of its own operations and supervisory

responsibility for the work safety of all production and business units under its direct management.

Article 26 Affiliated Entities must strengthen their internal safety management systems by: establishing and improving Work Safety Management Systems; standardizing management of special operations, hazardous operations, special equipment, hazard sources, and tiered safety risk control; enhancing safety awareness through education, training, and public outreach; conducting thorough work safety inspections; advancing work safety standardization and improving overall safety performance; and ensuring the continuous achievement of safe production.

Article 27 Affiliated Entities must establish a clear environmental protection accountability system that: clearly defines the roles and responsibilities of responsible personnel; and implement measures to prevent pollution and damage caused by emissions and byproducts including wastewater, waste gas, solid waste and residues, dust and malodorous gases, radioactive substances, noise, vibration, light radiation, electromagnetic radiation, and other pollutants generated during production, construction, or related activities.

Article 28 The Company shall implement a policy of prevention first, integrating hazard prevention, control, and elimination into its operations. It shall: maintain an effective occupational hazard health management

system; provide employees with occupational disease prevention equipment that meets national occupational health standards; supervise and guide employees in the correct use of such equipment correctly in accordance with established rules; and prohibit the substitution of equipment with monetary or material compensation.

Section 7: Quality Compliance Obligations

Article 29 The Company shall strictly comply with all applicable laws and regulations governing quality management. To ensure high standards, the Company shall improve its product quality management system, strengthen process control, maintain rigorous quality standards at every stage to ensure the delivery of high-quality products and services.

Article 30 The Company shall fully honor its contractual obligations related to the quality of products and services, as stipulated in contracts, agreements, and other binding documents. It shall ensure that all delivered products and services meet or exceed the quality levels committed to in such documents, and contribute to preserving and enhancing the Company's business reputation.

Section 8: Intellectual Property and Trade Secret Compliance Obligations

Article 31 The Company is committed to innovative development and actively encourages creativity and intellectual advancement. It emphasizes the strategic role of patents, trademarks, copyrights, and other

forms of intellectual property (IP). It shall strengthen the creation, protection, and utilization of IP, integrate IP management into technology research and development and asset operations, and continuously enhance the Company's core competitiveness through effective IP strategies.

Article 32 The Company shall promptly apply for the registration of IP achievements, standardize the licensing and transfer of IP rights, strengthen the protection of trade secrets and trademarks, ensure lawful use of third-party IP and take proactive measures to prevent infringement.

Article 33 The Company recognizes the importance of brand development and uses trademarks as key vehicles to build and promote its brand. To support this objective, the Company actively cultivates brand awareness among employees and fosters a corporate brand culture. The Company has established unified brand management standards across the enterprise, product, and project levels. Registered trademarks shall be used appropriately on goods, product packaging, containers, business transaction documents, and in advertising, exhibitions, and other commercial activities. The Company shall ensure that registered trademarks are not left unused for three consecutive years, in order to avoid the risk of cancellation.

Article 34 The Company places high importance on the protection of trade secrets. In any activity involving confidential or proprietary information, such as consulting, negotiations, technical reviews,

achievement appraisals, collaborative development, technology transfers, joint ventures, securities issuance, due diligence, or asset inventory, the Company shall require the signing of confidentiality agreements with all relevant parties to safeguard its trade secrets and proprietary information.

Section 9: Obligations to Standardize Labor Practices

Article 35 Employees are the Company's most valuable asset and the foundation of its reform, innovation, and development. The Company shall strictly comply with applicable labor laws and regulations, establish and improve its labor contract management system, and standardize the procedures for the signing, performance, modification, and termination of labor contracts.

Article 36 The Company shall establish lawful and standardized labor management systems and comply with all relevant employment and work permit regulatory requirements, protect employees' lawful rights to receive fair labor compensation, rest and leave, participation in social insurance programs, and other lawful benefits and protections, and avoid evading any legal obligations to employees in any form.

Article 37 The Company adheres to the principles of open recruitment, competitive selection, merit-based hiring, and optimal talent selection. It shall establish fair, just, open, and transparent recruitment and evaluation systems, and make hiring, evaluation, and promotion decisions based on employees’ capabilities and performance.

Article 38 The Company shall comply with national laws and regulations regarding labor protection and working conditions, implement standard working hour systems, provide employees with opportunities for on-the-job learning, skills training, and professional development, provide appropriate labor protection equipment, tools, and devices based on specific work circumstances, and establish safe operating procedures and regulations.

Article 39 The Company shall provide guidance and establish standards for employee conduct by encouraging the performance of duties with diligence, compliance, high quality, and efficiency. It shall also promote the mutual development of both the enterprise and its employees.

Section 10: Obligation to Pay Taxes Lawfully

Article 40 The Company shall strictly comply with all applicable national tax laws and regulations and fulfill its tax obligations in accordance with the law.

Article 41 The Company shall strengthen the foundation of tax management, standardize tax-related business practices, establish efficient tax information communication mechanisms, integrate tax risk control into the Company's overall risk management framework, and actively prevent and manage tax-related risks.

Article 42 The Company shall manage invoices in accordance with invoice management regulations issued by tax authorities. It shall collect and process special VAT invoices, ordinary VAT invoices, and electronic VAT invoices in line with business needs and legal requirements, maintain invoice registration ledgers, track invoice issuance, usage, and inventory accurately, and submit periodic reports on invoice usage to the competent tax authorities.

Article 43 The Company shall lawfully conduct tax registration, maintain accounting books and preserve supporting vouchers, file tax returns, truthfully report on business operations, financial performance, and system implementation, provide relevant reports and materials as required, and refrain from any concealment, omission, misreporting or tax evasion.

Section 11: Business Partner Compliance Obligations

Article 44 The Company shall select business partners based on the principles of legality, integrity, optimal selection, and mutual benefit. Before entering into cooperation, the Company shall assess partners' creditworthiness and contract performance capability. It shall progressively establish legal and compliance risk control mechanisms for managing business partners.

Article 45 The Company shall monitor business partners' capacity to meet compliance obligations related to their roles and responsibilities,

conduct creditworthiness reviews as required, classify business partners based on their legal and compliance risk levels, apply appropriate compliance management measures based on the risk classification, and maintain continuous oversight and monitoring.

Article 46 For key business partners, the Company shall conduct targeted compliance investigations, promote compliance through mechanisms such as signing compliance agreements and requiring compliance commitments, and enhance partner awareness of the Company's compliance philosophy and standards through compliance inspections, training programs, information sharing and collaborative exchanges. The Company shall encourage partners to meet their compliance obligations and take proactive steps to prevent legal and compliance risks within the partnership.

Article 47 The Company shall lawfully and compliantly collect, process, store, and use business partners' confidential information and protect business partners' privacy and data security in accordance with legal and contractual obligations.

Section 12: Data Compliance Obligations

Article 48 The Company complies with the *Personal Information Protection Law of the People's Republic of China* and the *Data Security Law of the People's Republic of China*. It upholds the principles of

legality, legitimacy, and necessity throughout the full lifecycle of data activities, including collection, storage, processing, and transmission.

Article 49 The Company has established a comprehensive Data Classification and Grading Management System. It precisely classifies and grades data based on factors such as sensitivity level and impact scope, and implements differentiated security control measures to ensure appropriate protection and compliance.

Article 50 During data collection, the Company shall clearly inform data subjects of the purpose, scope, and method of data collection and use, obtain explicit authorization and consent from data subjects, and prohibit any form of unauthorized or illegal data acquisition.

Article 51 The Company shall ensure that data is stored using secure and reliable storage technologies and equipment. It shall implement off-site disaster recovery mechanisms and maintain robust safeguards to ensure data integrity, availability, and protection against loss or damage.

Article 52 During data processing, the Company shall use advanced encryption algorithms to protect data confidentiality, employ security audit tools to monitor and log data processing activities in real time, and prevent data tampering or leakage.

Article 53 The Company shall ensure the security of data in transit by using encrypted communication channels and protecting data security throughout transmission.

Article 54 The Company shall periodically assess and test data security controls and systems, establish and maintain effective Data Security Emergency Response Mechanisms, promptly identify and remediate potential security vulnerabilities, and continuously optimize the data security management system to safeguard data and ensure the stability of business operations.

Chapter 3: Employee Compliance Obligations

Section 1: Duty of Loyalty

Article 55 Employees shall fulfill their duty of loyalty to the Company. They shall actively contribute to the Company's growth and development, safeguard the Company’s reputation, and refrain from any conduct that damages the Company’s image, credibility, or lawful interests.

Article 56 Employees shall comply with all applicable national laws and regulations, adhere to the Company’s internal rules, policies, and procedures, as well as observe labor discipline and uphold professional ethics. Employees shall perform their duties diligently and responsibly, complete assigned tasks on time, accept and cooperate with managerial oversight, and participate in regular performance evaluations.

Article 57 Employees shall truthfully disclose to the Company all relevant information, including basic personal details, employment

history, and other information pertinent to their role, duties, or performance.

Article 58 Employees shall comply with all applicable non-compete obligations during employment and for a specified period following separation. They shall not engage in or support any of the following activities that create a conflict of interest:

(1) Operating or assisting others in operating businesses that are similar to or in competition with the Company;

(2) Conducting transactions as a supplier or distributor without full disclosure to the Company;

(3) Participating in any other activity that is detrimental to the Company's legitimate interests.

Serious violations of non-compete obligations may constitute the crime of Illegal Operation of a Competing Business under applicable law.

Article 59 Employees shall prioritize the Company's interests and avoid conflicts of interest. The following conduct is strictly prohibited unless fully disclosed and approved:

(1) Participating in or supporting activities that are in competition with the Company;

(2) Investing in non-publicly listed companies that are in competition with the Company;

(3) Holding concurrent positions with or offering assistance to competing organizations;

(4) Trading with the Company directly or indirectly, such as acting as a supplier or distributor, without honest disclosure.

Section 2: Duty of Confidentiality

Article 60 Employees shall comply with the Company's confidentiality policies and systems and fulfill their obligations to protect state secrets as required by law, the Company's trade secrets and confidential business information, and maintain confidentiality of customers' confidential and sensitive information in accordance with applicable laws, regulations, rules, regulations, and contractual requirements. This duty of confidentiality remains in effect after the termination of the employment relationship.

Article 61 Employees shall strictly follow internal approval procedures on disclosing any confidential information to external parties. Unauthorized sharing—regardless of intent—is strictly prohibited.

Article 62 Upon separation from the Company, employees must return all confidential documents and materials, shall not make or retain copies, backups, or replicas, and shall not transfer any confidential information to other employers or external entities.

Article 63 Employees shall not, without prior approval and authorization, disclose any Company information to third parties,

including technical information, business information, operational information, personnel information, or other sensitive or proprietary content. If an employee becomes aware of a confidentiality breach or potential breach, they must promptly take action to prevent further disclosure and report the incident so that remedial measures can be taken to minimize potential losses.

Section 3: Duty to Protect Corporate Property

Article 64 Corporate property includes both tangible and intangible assets. Tangible property includes funds, resources, products, equipment, facilities, real estate, and other physical assets. Intangible property includes patent rights, trademark rights, copyrights, trade secrets, domain names, and other IP assets.

Article 65 Employees shall handle and use Company property in a responsible and diligent manner. They shall not use Company property for personal purposes, misuse, misappropriate, damage, or dispose of Company property without proper authorization. Employees shall proactively report any aging, malfunctioning, or damaged equipment or assets to relevant Company departments to prevent further loss of Company property.

Article 66 The Company's intellectual property and other intangible assets are among its most competitively valuable resources. Employees

shall protect and respect all forms of the Company's intangible property and take proactive measures to prevent infringement by third parties.

Section 4: Anti-Corruption and Anti-Commercial Bribery Obligations

Article 67 All employees, especially management personnel, shall lead by example, uphold integrity, and resolutely resist all forms of corruption and commercial bribery.

Article 68 Employees, especially management personnel, shall not engage in any of the following activities:

(1) Abusing authority to infringe upon the interests of state-owned assets;

(2) Using authority to seek personal gain or damage the Company’s lawful interests;

(3) Misappropriating, embezzling, or misusing Company property without authorization, or accepting bribes;

(4) Transferring Company interests to themselves or other third parties by taking advantage of their official positions.

Article 69 All employees, especially management personnel, shall exercise authority properly and shall not engage in the following activities:

(1) Using authority to secure positions or economic benefits for spouses, children, or other persons with special relationships, or facilitating such individuals' profit-making activities;

(2) Engaging in business transactions with enterprises operated by spouses, children, or related parties that may harm the Company's economic interests;

(3) Engaging in any other conduct that infringes upon public interests or damages the Company’s interests.

Persons with special relationships include close relatives or individuals who share a common financial or personal interest with the employee.

Article 70 Employees shall not, in the course of conducting business, offer bribes or improper benefits, including money, gifts or favors, to transaction counterparts or related parties who can influence transactions.

Article 71 Employees shall handle all donation and sponsorship activities in accordance with applicable laws, regulations, and the Company’s compliance policies. All such activities shall be conducted with integrity and transparency, authorized and documented, and aligned with legitimate Corporate Social Responsibility Objectives The following conduct is strictly prohibited:

(1) Providing donations and sponsorships as a form of bribery;

(2) Using the guise of donations or sponsorships to offer improper benefits;

(3) Soliciting or accepting improper benefits, including but not limited to kickbacks, commissions, information fees, or service fees from recipients, organizers, beneficiaries, undertaking units, or intermediaries;

(4) Making unauthorized donations or sponsorships in a personal capacity using Company property;

(5) Engaging in embezzlement, unjust enrichment, or misappropriation of funds;

(6) Committing any other illegal or unethical acts in connection with donation or sponsorship activities.

Article 72 All employees shall practice diligence and frugality and refrain from extravagant or wasteful conduct, especially during official functions or business-related consumption. Employees must strictly adhere to the Company's policies and procedures governing business etiquette and expense reimbursement, and ensure all economic exchanges related to business hospitality are compliant, documented, and justified.

Section 5: Duty to Maintain Corporate Image

Article 73 Employees shall actively safeguard and promote the Company's corporate image and reputation. They are expected to actively promote and advance the Company's culture, and contribute to enhancing the Company's brand value and social influence.

Article 74 When interacting with external stakeholders, employees shall recognize that they represent the Company at all times, and conduct themselves in a manner that is lawful and compliant, honest and ethical, respectful, courteous, and professional, and reflective of personal integrity and self-discipline.

Article 75 Employees shall maintain a professional personal image by observing appropriate business etiquette in all professional settings, and wear formal or business attire when attending important meetings, business receptions, or other formal occasions.

Section 6: Duty to Report

Article 76 Employees have a responsibility to refrain from participating in, facilitating, or concealing illegal or irregular corporate conduct. Employees shall report potential misconduct in a timely manner. Reports may be submitted in the employee's name to the Discipline Inspection and Supervision Department or the Legal and Compliance Department through written reports, oral communication, email, or internal information system channels.

Article 77 Departments that receive such reports shall respond promptly and appropriately, handle all reports in accordance with the Company's rules and regulations, and maintain confidentiality regarding both the reported information and the identity of the whistleblower.

Article 78 Employees who report illegal or irregular conduct shall receive full protection. No entity or individual may discriminate against, harass, or retaliate against employees for reporting concerns in good faith.

Section 7: Information Disclosure Obligations

Article 79 The following parties bear legal and regulatory information disclosure obligations: The Company itself, directors, senior management, shareholders, actual controllers, acquirers, counterparties to major transactions, and participants in major asset restructurings, refinancing activities, bankruptcy proceedings (including administrators and their members), and other individuals or entities as stipulated by applicable laws, regulations, or the China Securities Regulatory Commission.

Article 80 Disclosure obligors shall ensure that all information disclosed is truthful, accurate, and complete. Disclosures must not contain false statements, seriously misleading statements, or material omissions. Obligors shall bear individual and joint liability for the truthfulness, accuracy, and completeness of disclosed information.

Article 81 All information disclosures shall strictly follow the Company's review and verification procedures. Information may only be disclosed externally after necessary internal review and verification.

Article 82 Disclosure obligors and individuals with access to undisclosed information are responsible for maintaining its confidentiality.

Specifically, they shall not disclose Company information externally in any form without prior authorization. They shall limit internal access to the information to the minimum necessary scope before it is publicly disclosed.

Section 8: Prohibition of Insider Trading

Article 83 Insider trading refers to the use of material non-public information by individuals with insider access and persons who have illegally obtained insider information. Such individuals are prohibited from buying or selling related securities based on this information, disclosing insider information before it is publicly released, or recommending or encouraging others to buy or sell such securities based on insider information.

Article 84 Employees are prohibited from using their official positions to obtain or share material non-public information and shall not directly or indirectly engage in insider trading related to the Company's securities.

Article 85 Prior to the authorized public disclosure of sensitive or insider information, employees shall not disclose such information to any unauthorized individuals (including relatives), or make public remarks through any channels that could influence market prices or trading behavior.

Article 86 If an employee becomes aware of a situation that may involve insider information, they must immediately report the matter to the Legal and Compliance Department and cooperate fully with efforts to implement information isolation and enforce confidentiality measures.

Section 9: Occupational Health, Safety, and Environmental Protection Obligations

Article 87 Employees shall strictly comply with safe production operating procedures, properly use labor protection equipment, actively participate in occupational health and safety training programs, and immediately report any identified safety hazards or risks to the relevant department.

Article 88 Employees are responsible for maintaining healthy work and lifestyle habits and taking steps to prevent occupational diseases and workplace safety incidents.

Article 89 Employees shall develop strong safety awareness, fulfill safety obligations, consciously comply with the Company's security and safety provisions, and actively cooperate with relevant departments in security, emergency response, and incident prevention efforts.

Article 90 Employees shall promote environmental protection by practicing green office principles, reducing resource consumption and environmental impact, using office supplies responsibly, minimizing

waste generation, and conducting waste sorting and disposal in accordance with Company policies.

Section 10: Other Compliance Obligations

Article 91 Employees shall comply with all applicable laws, regulations, and standards. This includes, but is not limited to, national laws, administrative regulations, and departmental rules; laws and regulations in jurisdictions where the Company operates or invests overseas; internationally recognized rules and compliance requirements of countries or regions with broad international influence; industry-specific standards, mandatory technical standards, and recognized business and ethical practices; as well as all internal policies, rules, and procedures established by the Company.

In the event of any discrepancy in meaning or interpretation between the English and Chinese versions of this document, the Chinese version shall prevail.

This Policy was revised on August 31, 2026.