

Huaqin Technology Co., Ltd.

Anti-Corruption and Anti-Commercial Bribery Policy

Article I General Principles on Integrity and Compliance

Huaqin Technology Co., Ltd. (hereinafter referred to as “Huaqin Technology” or the “Company”) conducts its business within the legal frameworks on fair competition, anti-bribery, and anti-corruption of the countries in which it operates. The Company places its anti-bribery and anti-corruption obligations above its commercial interests and ensures that its business activities are conducted on the basis of fairness, impartiality, and transparency. This Policy applies to all directors, management personnel, and employees of all departments, subsidiaries, affiliated companies, and branches of Huaqin Technology Co., Ltd., as well as to its business partners.

Article II Integrity Requirements for Employees

Employees shall not, at any time and for any reason or in any manner, solicit, accept, or agree to accept any benefits from any entity or individual, nor shall they solicit or obtain such benefits in the name of, or for the benefit of, their close relatives, friends, or other closely related persons. At the same time, employees shall not, in any manner or for any reason, provide any benefits to the aforementioned entities, different departments, and/or other individuals. Specifically, employees shall, in their daily work and business interactions, comply with the following requirements:

- (i) It is strictly prohibited to offer (give) or accept (receive) gifts that violate laws or the policies of the counterparty company;
- (ii) It is strictly prohibited to use one’s position or authority to seek benefits for oneself or specific related parties through competing business operations or related-party transactions;
- (iii) It is strictly prohibited to solicit or accept any form of money, gifts, gift vouchers, rebates, securities, or other benefits in the course of business activities;

- (iv) It is strictly prohibited to participate in banquets, travel, or other High-end entertainment activities that may affect the impartial performance of duties in the course of business activities;
- (v) Where any employee of the Company is found to have engaged in any of the above acts, or where any dishonest or improper conduct occurs in the course of business activities, or where any suspected violation is identified, the relevant personnel shall immediately fulfill their obligation to report and make a disclosure.

Any employee who violates the Company's integrity requirements shall be deemed to have committed a serious violation of the employer's rules and regulations. The Company shall have the right to directly terminate the employment relationship in accordance with the Labor Law, the Labor Contract Law, and the provisions of this manual, and shall have the right to claim compensation from the employee for any losses thereby caused. Where an employee's conduct constitutes a criminal offense or violates laws such as the Public Security Administration Punishments Law, the Company shall transfer the case to the judicial or administrative authorities for handling.

Article III Integrity Requirements for Business Partners

Business partners shall strictly comply with all integrity management requirements for trading counterparties formulated by the Company, and shall never request, solicit, or provide any bribes or other improper benefits to any employee of the Company or to such employee's related persons or designated persons, nor shall they engage in any conduct whereby they directly or indirectly obtain improper benefits from any employee of the Company or such employee's related persons or designated persons.

Where any employee of the Company requests, solicits, or accepts any bribe or other improper benefit, or where there is any conduct whereby improper benefits are directly or indirectly obtained from any employee of the Company or such employee's related persons or designated persons, the business partner shall immediately make a report and provide relevant evidence. Any business partner and its employees who violate the Company's integrity commitments shall be deemed to have committed a fundamental

breach of contract. Once verified, the Company shall immediately suspend, terminate, or rescind the trading relationship without assuming any liability, and shall pursue economic and legal liabilities against the relevant parties.

Many of the countries in which Huaqin Technology conducts business have enacted laws prohibiting the offering, provision, or acceptance of bribes between private entities (i.e., not limited to government officials). Huaqin Technology's policy requires full compliance with all anti-corruption laws of the countries in which the Company operates. This provision applies not only to all employees, senior management, temporary workers, contract workers, and sales representatives of the Company, but also to the Company's business partners, including suppliers and agents.

Article IV Reporting Channels

All employees and business partners have the responsibility to report any known or suspected violations, including violations of laws, regulations, standards, and Company policies. Such reporting does not constitute disloyalty to others; on the contrary, it serves to protect the reputation and credibility of the Company and its employees. The Company will treat all inquiries and reports with sensitivity and prudence, and will strictly keep the information of whistleblowers confidential.

- Dedicated reporting email: report@huaqin.com
- Reporting hotline and WeChat: 18516617679 (independent hotline, managed by dedicated personnel)

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