

Luxshare Group

Global Code of Business Conduct and Ethics

Table of Contents

Chairwoman's Messages	1
Global Code of Business Conduct and Ethics	1
Chapter 1: Our Commitment — Purpose, Scope, and Interpretation.....	1
1.1 Our Purpose.....	1
1.2 Scope of Application.....	2
1.3 Strict Enforcement of the Law	2
1.4 Hierarchy of Standards.....	3
1.5 Interpretation and Clarification of the Code.	3
1.6 Effective Date of the Code.....	3
Chapter 2: Our Shared Responsibilities.....	3
2.1 Responsibilities of Managers	3
2.2 Responsibilities of Employees	4
Chapter 3: Integrity in Business – How We Earn Trust	4
3.1 Guidelines for Interactions with Business Partners	4
3.2 Anti-Bribery and Anti-Corruption Policy	5
3.3 Gifts and Business Hospitality.....	7
3.4 Fair Competition and Antitrust.....	10
3.5 Interactions with Government Departments and Public Affairs	13
Chapter 4: International Trade and Export Controls	13
4.1 International Trade and Customs Compliance	13
4.2 Export Controls.....	14
Chapter 5: Information Asset Protection and Communication Guidelines.....	15
5.1 Employee Confidentiality Obligations	15
5.2 Protection of Intellectual Property.....	16
5.3 Data Protection and Information Security.....	16
5.4 AI Usage Guidelines.....	17
5.5 Media and Social Media.....	18
Chapter 6: Employees and Corporate Social Responsibility	18
6.1 Human Rights and Decent Work	18
6.2 Employee Health and Safety.....	19
6.3 Environmental Protection.....	19
6.4 Community Contribution.....	20
Chapter 7: Responsibilities to the Company and Shareholders.....	20
7.1 Conflict of Interest	20
7.2 Insider Trading.....	23
7.3 Books□ Records and Information Disclosure	24
7.4 Use of Company Assets.....	25
Chapter 8: Reporting, Investigation and Discipline	25
8.1 Reporting Channels	25
8.2 Scope and Timing of Reporting	26
8.3 Anti-Retaliation Policy.....	26
8.4 Investigation and Handling	26

Chairwoman's Messages

Dear Colleagues,

At Luxshare Group, our most valuable asset is our reputation. Our reputation is built on the foundations of integrity, excellence, and the trust of our customers, and it is continuously shaped and strengthened by every decision we make and every action we take each day.

The Global Code of Business Conduct and Ethics ("Code") reflects the shared values of all Luxshare Group employees and represents our solemn commitment to conducting business with integrity. Upholding the highest ethical standards is the fundamental path to achieving sustainable growth and earning the trust of our global customers, suppliers, and partners.

This Code provides clear guidance on the ethical and legal issues you may encounter in your daily work. I encourage everyone to study it carefully, understand it thoroughly, and put it into practice in your day-to-day responsibilities.

Let us work together to ensure that every decision we make and every collaboration we engage in reflects our unwavering commitment to compliance, integrity and excellence.

Thank you all.

Grace WANG

December 30, 2025

Global Code of Business Conduct and Ethics

Chapter 1: Our Commitment — Purpose, Scope, and Interpretation

Grounded by the Company's core values ("Customer Success, Relentless Mission, Continuous Innovation, United Journey, and Self-driven Growth"), this Code establishes the following fundamental behavioral principles for all employees in performing their respective duties.

1.1 Our Purpose

- **Integrity:** Integrity means honoring our commitments by aligning our words with our actions. We have to choose and implement what is right at all times and in all circumstances, whether or not we are being observed. Integrity is

reflected in every interaction we have with customers, suppliers, business partners, and the communities we serve, and it is the foundation of the trust we earn.

- **Compliance:** We are committed to strictly adhering to all applicable laws and regulations in the countries and regions where we operate, as well as to our own internal policies. Compliance represents the minimum standard for our business conduct and is a boundary that must never be crossed.
- **Respect:** We respect the value and dignity of every employee and are dedicated to fostering a diverse, inclusive, and equitable work environment.
- **Responsibility:** We take responsibility for our actions and their consequences. This sense of responsibility extends to our product quality, commitments to shareholders, environmental protection, and contributions to society.

1.2 Scope of Application

This Code applies to everyone who works for or on behalf of Luxshare Precision Industry Co., Ltd. and its affiliated entities (collectively, the “Luxshare Group” or the “Company”), including, without limitation, the Company’s regular employees, senior management, directors, supervisors, dispatched workers, interns, rehired personnel, outsourced personnel, and consultants, without any exception.

Not only we encourage you to comply with this Code, but also, we expect you not to induce or encourage others to violate it. Likewise, we expect our third-party business partners, such as suppliers, agents and distributors, to adhere the business conduct standards that are consistent with this Code. We only work with partners who share the same integrity value and commitment.

This Code is a principles-based document. For more detailed operational guidance, you should refer to Luxshare Group’s applicable policies and procedural documents. All policies referenced in this Code are available on the Company’s intranet or may be obtained by contacting the Human Resources Center. For general questions regarding this Code, please reach out to the Human Resources Center or the Intellectual Property & Legal Center.

1.3 Strict Enforcement of the Law

Since Luxshare Group operates globally, therefore, the laws and regulations may vary across different territory and jurisdictions. Consequently, when handling specific matters, if the requirements of this Code differ from those of local laws or

regulations, we must always adhere to the stricter standard.

If you are uncertain about which standard applies, you should follow the higher ethical standard and immediately consult with the Inspection and Investigation Division.

1.4 Hierarchy of Standards

Luxshare Group's compliance framework operates as a comprehensive system. Building upon this foundation, the Company has also developed a series of specialized policies, such as the Luxshare Group Anti-Bribery Management Manual, the Luxshare Group Personal Information Protection Policy, and the Luxshare Group Export Control, Economic Sanctions, and Supply Chain Compliance Guidelines (General Provisions) (including any subsequent amendments), to provide more detailed and operational requirements for specific areas, such as anti-corruption, data protection, and export controls.

Where the requirements of any specialized policy are stricter than those set forth in this Code, the stricter requirements of the specialized policy must be followed.

1.5 Interpretation and Clarification of the Code.

The Intellectual Property and Legal Center of Luxshare Group is responsible for the interpretation and clarification of this Code. Should any department encounter any questions during the implementation of this Code, please contact the Intellectual Property and Legal Center in a timely manner.

1.6 Effective Date of the Code.

Upon approval by the Intellectual Property and Legal Center, this Code shall become effective as of **January 1, 2026**.

Chapter 2: Our Shared Responsibilities

2.1 Responsibilities of Managers

Managers shall lead by example and consistently uphold the highest professional and ethical standards; foster an open, no-retaliation communication environment that encourages questions and good-faith reporting; act as responsible partners in the workplace and community, proactively promoting and driving behaviors aligned with this Code; oversee the implementation of training and processes to ensure the team correctly understands and implements this Code and its relevant policies accordingly; immediately stop, report according to procedure, and properly preserve evidence of any discovered or reasonably suspected violations; maintain complete records of training, communications, and handling of incidents, and be

subject to external audits and accountability; and be held legally and procedurally accountable for any negligence, dereliction of duty, or acts of covering up or shielding misconduct.

2.2 Responsibilities of Employees

Employees shall complete the required training on a quarterly basis and submit a written confirmation each quarter, declaring that they have read, understood, and committed to comply with this Code (including any subsequent amendments). In all work activities, employees shall strictly adhere to this Code, applicable laws and regulations, and the Company policies; if uncertain situations arise, employees shall immediately suspend the activity and promptly consult with their direct supervisor. Employees is obligated report any known or reasonably suspected violations truthfully and in timely manner through the designated channels, and actively cooperate in any investigations.

Chapter 3: Integrity in Business – How We Earn Trust

When engaging with the Company's customers, suppliers, and other business partners, as the Company's representation, you must always adhere to the highest standards of integrity, honesty, and fair dealing.

3.1 Guidelines for Interactions with Business Partners

The Company strictly prohibits any form of kickbacks, bribery, unearned compensation, or other improper payments and benefits. Conducting business with all business partners honestly is the foundation in maintaining healthy and lasting business relations. Any employee who encounters a third party offering such improper benefits or inducements must immediately report the matter to their direct supervisor and the Inspection and Investigation Division.

3.1.1 Commitment to Customers

Luxshare Group's reputation and brand are built on the innovation and quality of its products and services. Luxshare Group consistently pursues the highest standards of product quality and performance to earn customers' trust in the reliability, high quality, and excellence of its products. Our success depends on customer satisfaction, trust, and goodwill. Therefore, we are committed to respond and address the customer opinions, inquiries, and feedback in a prompt, courteous, and fair manner.

3.1.2 Guidelines for Suppliers and Other Business Partners

In procurement operations, Luxshare Group is committed to ensuring the continuity

and reliability of its supply chain. The selection and collaboration with all suppliers must adhere to the following principles:

- **Fairness and Impartiality:** All potential suppliers should be given the same and fair opportunity for consideration.
- **Objective Decision-Making:** All procurement decisions must be based on objective criteria, such as product price, quality, and the supplier's reliability and integrity.

3.2 Anti-Bribery and Anti-Corruption Policy

Luxshare Group strictly complies with all applicable anti-corruption and anti-bribery laws and regulations in all its global operations and maintains a zero-tolerance stance toward any form of corruption or bribery. No personnel shall, under any circumstances, directly or indirectly (including through third parties) offer, promise, give, solicit, or accept any improper benefits. Improper benefits include, but are not limited to, bribes, kickbacks, and "facilitation payments" intended to expedite or secure routine procedures.

3.2.1 Engagement with Third Parties: Employees must not, in any form, instruct, tolerate, or condone third parties to engage in actions prohibited by the Company. When engaging and managing third parties, employees are responsible for conducting due diligence in accordance with laws and regulations and continuously monitor the third party's compliance during the terms of business transaction. Upon identifying any unusual payment requests, suspicious expenses, unclear beneficiary identities, or other warning signs, employees must immediately suspend the collaboration, preserve relevant records, and report the matter to the Inspection and Investigation Division.

3.2.2 Interactions with Government/Public Officials: When engaging with any Government/Public Officials, employees must adhere to the highest compliance standards.

"Government/Public Official(s)" could be broadly defined. In defining a Government/Public Official you should focus on the public functions performed by the individual rather than their specific title. This definition includes, but is not limited to:

- Any personnel at any level of a country's executive, legislative, judicial branches, and its departments or agencies;
- Directors, senior officers, and employees of entities that are state-owned,

state-controlled, or perform public functions (e.g., state-owned enterprises, public institutions, public hospitals/schools, research institutes, etc.);

- Officials or employees of public international organizations;
- Individuals delegated by government authorities, state-owned enterprises, or public institutions to non-state entities who exercise management, supervision, or other powers representing public authority or public interest; and
- Foreign political parties, their officials, candidates for foreign public office, and the agents, advisors, or representatives of the aforementioned individuals.

Even if such entities operate within the commercial sector, their personnel could still be considered as “Government/Public Officials” if such entity is state-owned, state-controlled, or performs public functions.

3.2.3 “Thing of Value”: “Thing of Value” broadly refers to any tangible or intangible benefit, including but not limited to: gifts, meals, entertainment, cash or cash equivalents, securities, discounts, commissions, sponsorships, donations, internship or employment opportunities, etc.

- **Involving Government Officials:** The Company strictly prohibits providing any “Thing of Value” to any Government/Public Official for any reason or through any channel, whether directly or indirectly. This prohibition has no value threshold and applies regardless of the amount.
- **Commercial Interactions Between Private Enterprises:** Any form of improper transfer of benefits in commercial interactions with private enterprises is strictly prohibited. The specific standards and approval procedures for compliant gifting and business hospitality must be strictly carried out in accordance with this chapter and the Company’s Gifts and Hospitality Management Policy.

Providing benefits to Close Relatives or Close Associate of Government/Public Officials or private enterprises is deemed equivalent to providing such benefits directly to the Government/Public Officials or private-sector executive themselves, and is likewise prohibited. If there is any doubt regarding the identity or status of the counterparty, employees must consult with the Inspection and Investigation Division in advance; independent judgment is strictly prohibited.

The term “Close Associate” as used in these guidelines refers to individuals who maintain close social or professional relationships with

Government/Public Officials or private enterprises and are capable of influencing their decision-making. This includes, but is not limited to: employees, classmates, colleagues, and others.

3.2.4 Accurate Books and Records: All business-related expenses and transactions must be accurately, truthfully, and completely reflected in the Company's books and records. It is strictly prohibited to establish off-the-books accounts, fabricate transactions, or alter the purpose of vouchers to conceal any improper payments.

3.2.5 Personal Responsibility and Handling of Violations: Every employee is responsible for understanding and complying with the content of this chapter. In any uncertain situation, employees should suspend the relevant action and immediately consult with their direct supervisor or the Inspection and Investigation Division. Any violation of the provisions of this chapter will result in strict disciplinary action, including but not limited to termination of employment; in cases involving suspected criminal conduct, the Company will refer the matter to the judicial authorities for handling.

For more detailed provisions, please refer to the Anti-Bribery Management Manual, and always comply with the stricter requirements set forth therein.

3.3 Gifts and Business Hospitality

Normal business courtesies, such as modest gifts and hospitality, are common ways to establish and maintain a professional business relation. However, we must ensure that these activities are solely intended to promote professional cooperation, and are not used to obtain or reciprocate improper commercial advantages.

3.3.1 Core Principles

No gift or hospitality shall be used to influence the business decisions of the recipient, or to create the impression that it is intended to affect the recipient's objective judgment. Any gift or hospitality that could potentially damage the Company's reputation is strictly prohibited. The rules in this section are designed to protect both your and the Company's reputation and to prevent allegations of bribery or undue influence; you are responsible for verifying in advance whether your actions comply with this Code.

3.3.2 Generally Permissible Gifts and Hospitality

For commercial interactions between private enterprises, gifts and hospitality are

acceptable only if they simultaneously meet the following conditions:

- 1) **Business-Related:** Gifts and hospitality must be directly related to the Company's legitimate business purposes, such as providing working meals during business meetings or giving promotional souvenirs to support the Company's brand.
- 2) **Moderate Value:** Any single gift or hospitality offered to an individual shall not exceed the monetary limit set by the Company. The specific limits applicable in Mainland China (including Hong Kong and Macau), Taiwan, and overseas regions/countries shall be governed by the Company's internal policy titled the Gift and Hospitality Limit Table (including any amendments thereto from time to time). For countries or regions not yet covered by the above Standard Table, the responsible department must apply to the Inspection and Investigation Division for approval of a temporary limit prior to commencing business activities, and may only proceed after obtaining written approval. If the local laws or customer policies set out a stricter standard, then the stricter standard shall apply. For hospitality, per-person expenses should also comply with local business practices and must not be extravagant or lavish.

For clarity, complying with the threshold set forth hereunder shall not be sufficient to justify or legally constitute any form of endorsement. Additionally, all gifts, hospitality, travel, or sponsorships must be accurately recorded in the books, accompanied by the required supporting documents and a list of the recipients or participants. It is strictly prohibited to circumvent the limits by splitting, accumulating multiple transactions, or deliberately altering account categories, recipients, or other details.

- 3) **Low Frequency:** The provision of gifts or hospitality to the same recipient shall be infrequent to avoid creating an impression of routine or systematic attempts to curry favor.
- 4) **No Influence on Decisions:** Gifts and hospitality must not be linked to any specific business decision, nor give the recipient the impression that they are intended to obtain preferential treatment or reciprocation.
- 5) **Openness and Transparency:** Gifts and hospitality must be conducted in an open and transparent manner, with expenses accurately and completely recorded in accordance with financial policies. Records must not be vague, misleading, or falsified, and the business purpose and list of participants must be clearly documented. Event settings and content should be appropriate and

reasonable, avoiding the creation of improper impressions in public or on social media.

- 6) **Compliance with Laws and Policies:** Gifts and hospitality must comply with applicable laws, the internal policies of the recipient/donor company, and Luxshare Group's internal regulations.
- 7) **Presence of Organizer:** Activities related to business topics (such as business meetings) are permitted, e.g., product presentations, trade shows, or annual meetings. For invitations to or acceptance of non-regular business meals or other activities, the organizer or a representative of an appropriately senior level of the organizer must attend the event.

Common Examples:

- *Small promotional items, such as pens or notebooks bearing the Company logo.*
- *Ordinary business lunches or dinners arranged for project discussions.*
- *Small gifts given during traditional holidays that are appropriate and consistent with local cultural customs.*

3.3.3 Absolutely Prohibited Actions

Any of the following actions constitute a serious violation of this Code and are considered a "red line." Employees who engage in such actions will face strict disciplinary measures, including but not limited to termination of employment; the Company may also report the matter to judicial authorities in accordance with the law.

- 1) **Involving Government/Public Officials:** Providing any gift or hospitality of value to any Government/Public Officials.
- 2) **Exceeding Standards:** The value of the proposed gift or hospitality exceeds the monetary limits set by internal company policies, or the frequency of provision to the same recipient is high.
- 3) **Cash or Cash Equivalents:** Providing or accepting any form of cash, or cash equivalents such as gift cards, securities, personal loans, prepaid cards, or similar instruments.
- 4) **Conditional Exchange:** Any gift or hospitality accompanied by an explicit or implicit expectation of reciprocal benefit.
- 5) **Improper Entertainment:** Providing or accepting any extravagant, immoral,

reputation-damaging, or purely entertainment-related activities unrelated to the promotion, demonstration, or discussion of products or services.

- 6) **During Decision-Making Periods:** Providing gifts or hospitality to individuals involved in or able to influence decision-making is strictly prohibited during sensitive periods such as bidding, contract negotiations, audits, inspections, regulatory reviews, or other critical times.
- 7) **Benefits to Close Relatives or Associates of Business Partners:** Providing gifts, hospitality, employment opportunities, or other benefits to the Close Relatives or Associates of business partners in order to influence their decisions.
- 8) **Circumventing the Rules:** Circumventing value or frequency limits by splitting transactions, accumulating multiple transactions, changing account categories, reimbursing through personal accounts, deliberately changing recipients, or using third-party payments.
- 9) **Policy Conflicts:** Providing gifts or hospitality that violate applicable laws, the internal policies of the counterparty, or Luxshare Group's internal regulations.
- 10) **Negative Impact Upon Disclosure:** Providing gifts or hospitality that, if publicly disclosed, could have a negative impact on the Company.

3.4 Fair Competition and Antitrust

Luxshare Group is committed to competing in a free, fair, and orderly marketplace, winning through the quality of our products, technologies, and services. We strictly comply with all applicable antitrust and fair competition laws and regulations in every jurisdiction where we operate.

You must not enter into, attempt to enter into, or indirectly participate through third parties in any arrangement that restricts competition, whether such arrangement is in written, oral, or implied form, or occurs in any setting such as industry associations, standards organizations, consultants, or data platforms. Violations of antitrust laws constitute serious misconduct and may result in criminal and civil liabilities for both the Company and individuals. Prohibited conduct includes, but is not limited to, the following:

- Discussing or agreeing on prices, discounts, or pricing strategies;
- Allocating markets, customers, or sales territories;
- Collusion in bidding activities (including bid-rigging, cover bidding, bid

suppression, or bid rotation);

- Exchanging competitively sensitive information, such as capacity, output, costs, profits, credit terms, inventory levels, capacity plans, product roadmaps, marketing or sales plans, customer lists, or R&D and product-launch timelines;
- Coordinating to restrict the development of new technologies or the launch of new products, or initiating or participating in joint boycotts of third parties.

The term “Competitor” is broadly defined. In addition to traditional industry peers, it also includes any customers or suppliers that currently or potentially offer the same or substitutable products or services in the relevant market. When communicating with such parties, discussions must remain strictly limited to lawful, publicly, and industry-appropriate topics. If the conversation touches upon—or approaches—any of the sensitive areas described above, you must clearly state that such discussions are prohibited under Company policy, and immediately conclude the conversation or leave the meeting. Afterward, you must promptly report the incident to the Office of the Board Secretary, and, where appropriate, notify the Intellectual Property and Legal Center as well. All relevant details—including the time, location, participants, and key points of the conversation—must be documented accurately.

In certain limited circumstances, legitimate cooperation arrangements with competitors—such as joint ventures or franchise agreements—may constitute exceptions to the above restrictions. However, such arrangements must be reviewed and approved in advance by the Intellectual Property and Legal Center and must fully comply with all applicable antitrust and competition laws and regulations.

The Company may obtain competitive information only through the following lawful and legitimate channels:

- **Public Information:** Information that is publicly and legally accessible to anyone. Examples include prospectuses published by listed companies, annual reports, content on official websites, disclosure documents submitted to regulatory authorities, press releases, and media reports.
- **Authorized Information:** Information obtained through lawful procedures or expressly authorized in writing by the rights holder (such as customers or suppliers).
- **Commercially Procured Information:** Research reports, industry data, and

analytical products purchased through lawful and compliant commercial channels from reputable third-party research institutions or data service providers.

- Internal Proprietary Data: Data lawfully accumulated during the course of the Company's own business operations. The use of such data must not violate any confidentiality agreements or legal obligations that the Company has entered into with third parties (such as customers or suppliers).

Under no circumstances may information be obtained through any of the following illegal or unethical means:

- Fraud and Misrepresentation: Misleading others to obtain non-public information by using false identities, making false statements, or employing any other deceptive methods.
- Technical Intrusion: Attempting to bypass, disable, or otherwise circumvent technical access-control measures of any website, system, or database, including unauthorized data scraping or information extraction.
- Inducing Disclosure: Inducing, encouraging, or assisting any third party (including but not limited to employees or former employees of competitors, or suppliers) to violate their confidentiality agreements or legal obligations to their organization by disclosing protected trade secrets or confidential information.
- Use of Illegally Obtained Data: Using any dataset that is of unknown origin, not lawfully authorized, or not properly anonymized and aggregated. All data used must have a clear origin and a complete chain of authorization.

Neither the Company nor any third party acting on its behalf may engage in the following improper business practices:

- Disparaging or making false statements about competitors or their products/services;
- Stealing or unlawfully using trade secrets belonging to competitors;
- Illegally inducing another party to breach any contract entered into with a competitor;
- Improperly tying the supply of goods or services to the Company to the mandatory purchase of the Company's products;
- Conducting transactions using deceptive pricing or other arrangements likely to mislead counterparties.

If there is any doubt regarding the applicability of laws, compliance boundaries during interactions with agents or other third parties, or the appropriateness of topics discussed in meetings, employees must consult the Intellectual Property & Legal Department before engaging in discussions, exchanging information, or making commitments. For matters involving localization requirements in specific countries or regions, confirmation must be obtained from the Intellectual Property & Legal Department. Any violation of this provision will result in disciplinary action; if suspected of illegality, the Company will pursue legal liability in accordance with the law.

3.5 Interactions with Government Departments and Public Affairs

The Company respects and complies with all applicable laws and regulations governing interactions with government departments and public institutions. Any formal communication with Government/Public Officials or regulatory authorities (including meetings, correspondence, submitted materials, and in-person or online exchanges) must be conducted on behalf of the Company by the designated spokesperson or personnel expressly authorized in writing. No individual may make statements, commitments, or submit information on behalf of the Company without proper authorization. Any business engagement with a government entity or its affiliated institutions must obtain prior written approval from the Compliance Committee.

The Company maintains strict political neutrality and must not use Company funds, assets, or resources to support any political party or political candidate. No person may make political contributions on behalf of the Company without prior written approval from the Compliance Committee. All charitable donations, sponsorships, policy advocacy, lobbying, or other public affairs activities conducted in the name of the Company must follow internal approval procedures and documentation requirements to ensure full transparency, compliance, and traceability throughout the process.

Chapter 4: International Trade and Export Controls

As a globally operating Company, Luxshare Group is committed to strictly complying with all applicable international trade, customs, export control, economic sanctions, and anti-money laundering laws and regulations in every jurisdiction where it conducts business.

4.1 International Trade and Customs Compliance

The Company is committed to ensuring that all cross-border transactions are

conducted lawfully and in full compliance with applicable regulations. When handling import and export matters, you must ensure that all information submitted to customs and other regulatory authorities, including but not limited to product classification, valuation, and country of origin, is truthful, accurate, and complete.

Furthermore, the Company strictly complies with all applicable economic sanctions laws and must not conduct transactions with sanctioned individuals or entities. The Company also prohibits the use of Company assets or services for money laundering or any other illegal activity.

If you identify any suspicious transactions or warning signs, you must immediately suspend the related activity and report to the Compliance Management Department.

4.2 Export Controls

The Company is committed to complying with all applicable export control laws and regulations, including but not limited to those of China, the United States, and the European Union. These laws may restrict the transfer of certain products, technologies, or software to controlled countries, individuals, or entities.

Before conducting any transaction that may involve an export, you must complete the following due diligence procedures:

- **Screening of Counterparties:** Verify that customers, suppliers, intermediaries, or end users are not listed on any government sanctions or restricted party lists.
- **Identification of Controlled Items:** Determine whether the products, technologies, or software involved are subject to export controls.
- **Risk Assessment:** Understand the ultimate destination and end-use, and assess whether an export license is required.
- **Record Retention:** Maintain complete and accurate records of all relevant transactions.

The Company strictly prohibits any conduct that may violate export control laws and regulations. Violations may result in severe consequences for both the Company and individuals, including substantial fines, loss of business licenses, and even criminal liability. If you have any doubts, you must suspend the transaction and report to the Compliance Management Department immediately.

Due to the complexity and specialized nature of international trade compliance, the

content of this chapter is intended to provide only general principles. Therefore, employees who involved in the procurement, logistics, sales, finance, R&D, or any related functions not only has the obligation to master and comply with the applicable export control laws and regulations, but also comply with Luxshare Group export policy including but not limited to Luxshare Group Export Control, Sanctions, and Supply Chain Compliance Guidelines (General Provisions) and Luxshare Group Export Control, Sanctions, and Supply Chain Compliance Guidelines (Supplementary Provisions), which shall prevail as the final standard for daily operations.

Chapter 5: Information Asset Protection and Communication Guidelines

5.1 Employee Confidentiality Obligations

The Company's confidential information includes, but is not limited to, trade secrets, proprietary technologies, inventions, research and development plans, product information, pricing strategies, personnel information, financial data, supplier/customer/other business partner information, sales and marketing plans, investment and financing plans, and any other non-public information (including related intellectual property). Each employee has a strict obligation to maintain the confidentiality of such information both during and after employment and is strictly prohibited from disclosing, misusing, or improperly obtaining the Company's confidential information in any form.

Within the Company, confidential information must be shared strictly on a "need-to-know" basis. Prior to disclosure to any third party, a confidentiality agreement reviewed and approved by the Intellectual Property & Legal Center must be signed. When receiving confidential information from third parties, employees are likewise responsible for complying strictly with the terms of the relevant confidentiality agreements and must pay particular attention to the scope of permitted use, purpose, validity period, and the authorized recipients within the Company. Any questions should be directed to the Intellectual Property & Legal Center.

Information that exceeds the scope necessary for business purposes should be refused or immediately returned. Upon job transfer or termination, employees must return or destroy all Company materials in accordance with regulations and delete all confidential information stored on personal devices (e.g., mobile phones, personal computers). Employees who become aware of or reasonably suspect any leakage of confidential information are obligated to report it promptly. The Company is committed to protecting good-faith reporters and strictly prohibits any retaliation. Any violation of confidentiality obligations will be subject to serious

disciplinary action by the Company.

5.2 Protection of Intellectual Property

The Company places great importance on and is committed to protecting its technological innovations and creative achievements in areas such as products and manufacturing processes. It has established a comprehensive intellectual property (IP) protection system, covering patents, copyrights, trademarks, trade secrets, and other forms of IP.

Company respects and strictly complies with all applicable intellectual property laws and regulations. Employees are strictly prohibited from bringing in or using, in any form, files, data, code, or other IP from former employers or any third party without proper authorization. It is also strictly prohibited to apply for or register patents, copyrights, trademarks, trade secrets, or other IP in the Company's name using such unauthorized materials. Furthermore, downloading, installing, or using any software without proper authorization is strictly prohibited. All software requirements must follow the Company's software procurement and licensing management procedures to ensure valid authorization is obtained.

Any inventions or creations developed by employees during their employment through the use of Company resources or in the course of performing their duties shall be deemed the property of the Company. Employees are strictly prohibited from applying for patents or other intellectual property rights in any name other than the Company's, or from otherwise attempting to transfer or misappropriate the Company's intellectual property. Any violations involving infringement of the Company's or third parties' intellectual property rights will be subject to appropriate disciplinary action and legal liability. In serious cases, or where a criminal offense is suspected, the Company will refer the matter to judicial authorities and reserves the right to seek compensation for any resulting losses.

5.3 Data Protection and Information Security

The Company is committed to protecting the personal information and privacy of all employees, customers, suppliers, and other businessrelated parties, as well as safeguarding the security of the Company's data assets. We strictly comply with global data protection laws, including the Personal Information Protection Law and the General Data Protection Regulation, and handle personal information in accordance with the principles of legality, legitimacy, necessity, and good faith.

Information security is a shared responsibility of all employees. When handling sensitive data, such as personal information, financial data, technical secrets, or

business strategies, you must implement prudent security measures, including encryption and access controls. You must also properly manage account permissions, comply with document management rules, and report any potential security incidents immediately to the Intelligent Information Development Platform and the Compliance Management Department.

For any personal information or critical data transferred across borders or regions, you must strictly comply with relevant legal requirements for cross-border data transfer assessment or filing. No transfer may occur without prior assessment and approval.

For more detailed guidance, please refer to the Company's Personal Information Protection Policy.

5.4 AI Usage Guidelines

The Company encourages and supports employees in leveraging artificial intelligence (AI) to enhance work efficiency and innovation. To ensure security and compliance, all employees must prioritize the protection of the Company's information assets. It is strictly prohibited to input any Company confidential information (such as source code, financial data, strategic plans, etc.) or personal data (such as employee information, customer information, etc.) into external AI tools.

Employees bear ultimate responsibility for reviewing and modifying AI-generated content, which should be treated as a "preliminary draft" rather than a final product. Before formal adoption or external release, employees must fulfill the following three core review obligations: First, verify facts to guard against AI generating "hallucinated" information due to its technical limitations, which could lead to erroneous business decisions; Second, ensure originality by applying substantive intellectual effort to modify AI-generated content, avoiding direct use that may infringe third-party intellectual property rights. Third, eliminate bias, particularly in high-risk scenarios like human resources, by vigilantly identifying and removing any content that could lead to discriminatory outcomes, thereby mitigating legal litigation risks.

The following actions constitute absolute red lines and are strictly prohibited under any circumstances:

- Employees must not use AI for any illegal or improper activities;
- Employees must not circumvent the Company's security measures, access controls, or technical restrictions;

- Employees must not process others' personal information or biometric data without explicit consent;
- Employees must not create or distribute false information, deepfakes, or other misleading content;
- Employees must not infringe on the intellectual property rights of others or the Company's or customers' trade secrets;
- Employees must not publish AI outputs externally as-is, nor treat them as final, authoritative conclusions;
- Employees must not store or process Company data in personal accounts, unapproved devices, or personal cloud spaces; all Company data must be used only within Company approved, controlled environments.

5.5 Media and Social Media

Only formally authorized spokespersons or personnel designated by the Company Secretary's Office are permitted to represent the Company in releasing information to external parties or attending any interview or press release that include but not limited to the media (mainstream or social media), industry associations, investors, analysts, etc. If you receive any interview requests or inquiries of this nature, you must politely decline to respond and immediately forward the relevant information to the personnel designated by the Company Secretary's Office. If there is a legitimate need to disclose information externally or participate in interviews, please follow the procedures outlined in the "Group Guidelines for External Communications, Interviews, and Disclosure of Information."

When using personal social media, you are entitled to express your personal views; however, please note the following:

- You must not disclose any confidential information of the Company, its clients, or suppliers.
- You must not make any statements that could damage the reputation of the Company, its clients, or colleagues.

Chapter 6: Employees and Corporate Social Responsibility

6.1 Human Rights and Decent Work

Respecting the human rights is the cornerstone of sustainable business development. The Company consistently respects every employee and is committed to fostering a diverse, equitable, inclusive, and dignified work

environment. The Company pledges to prohibit forced labor and child labor, to never tolerate any form of inhumane treatment, to provide equal opportunities, and to strictly forbid any discrimination or harassment based on race, color, religion, gender, age, nationality, ancestry, citizenship, physical or mental disability, medical condition, sexual orientation, gender identity, veteran status, marital status, or any other legally protected characteristic. The Company also ensures that employees enjoy the rights to freedom of association and collective bargaining in accordance with applicable laws. Anyone who becomes aware of or witnesses human rights violations must immediately report them to their direct supervisor or the Human Resources Center.

6.2 Employee Health and Safety

The health and safety of employees are the Company's top priorities. The Company's goal is to achieve a "zero-accident" workplace. Every employee must strictly adhere to safety operating procedures and has the right to stop work if unsafe conditions are observed. Any safety hazards, near misses, or workplace injuries must be reported immediately.

To maintain a safe, respectful, and efficient working environment, applicable to Company premises, client sites, and all work-related activities, the Company enforces a zero-tolerance policy for workplace violence, threats, intimidation, possession of weapons, or being under the influence of alcohol or prohibited drugs during work. All employees are responsible for promptly reporting any safety risks, and in emergency situations, prioritize contacting law enforcement or security personnel. Any violation will result in severe disciplinary action, including dismissal; suspected illegal activities will be referred to judicial authorities. The Company reserves the right to conduct safety inspections in accordance with applicable laws and regulations.

6.3 Environmental Protection

The Company is committed to being a partner in environmental sustainability. While complying with all environmental laws and regulations in the jurisdictions where it operates, the Company actively follows international best practices and strives to meet higher environmental standards set by its customers. To achieve this, the Company establishes comprehensive environmental objectives and continuously works to minimize the negative impact of its products and operations on the environment. Effective measures are implemented to limit waste generation, promote resource recycling, and advance energy conservation, ensuring that every business activity aligns with the Company's commitment to sustainable

development.

6.4 Community Contribution

The Company is committed to continuously striving to be a contributing member of the global community. As corporate citizens in the locations where we operate, we have the responsibility to support community development and to participate in public welfare initiatives that enhance the well-being of local communities.

For more detailed information, please refer to the Company's documents on Employee Rights Protection and Corporate Social Responsibility Management.

Chapter 7: Responsibilities to the Company and Shareholders

7.1 Conflict of Interest

7.1.1 Definition of Conflict of Interest

A conflict of interest refers to any situation where an employee's personal interests (or the interests of their Close Relatives) are in actual, potential, or apparent conflict with the overall interests of the Company. To ensure fairness and integrity in decision-making, all employees have the responsibility to proactively identify, fully disclose, and properly manage any conflict of interest. For the purposes of this Code, Close Relatives include your spouse, siblings, children, parents, grandparents, step-relatives, in-laws, and any individual who resides in the same household with you.

7.1.2 Types and Examples of Conflicts of Interest

Conflicts of interest may arise in various forms. Below are common situations that require heightened attention. If you encounter any of the following scenarios, you must proactively disclose them in accordance with Company procedures and seek approval.

A. Financial Conflicts of Interest:

- 1) **Holding Significant Interests:** You or your Close Relatives hold Significant Financial Interests in competitors, suppliers, customers, or other business partners of the Company. "Significant Financial Interest" generally refers to: holding more than 1% equity in a publicly listed company; holding more than 5% equity in a non-listed company; the investment amount being materially large in absolute value; or the investment representing a substantial portion of your personal investment portfolio sufficient to create an actual or perceived conflict of interest. Holding such Significant Financial Interests is strictly prohibited without

prior approval from the Compliance Committee.

Example: Your spouse is a major shareholder of a supplier that is currently participating in a procurement bidding process of your department.

- 2) **Receiving Improper Benefits:** You or your Close Relatives are prohibited from accepting personal loans, commissions, payments or any other form of benefits from any entity that has, or seeks to have, business dealings with the Company.

B. Relationship Conflicts

- 1) **Employment of Relatives:** Without approval from the vice president of the Human Resources Center, you are prohibited from hiring or appointing your Close Relatives within the same department, or assigning them to positions involving direct reporting relationships, financial dependency, or influence over you. If such a relationship develops between two employees, the employee in the higher position must immediately report it to his direct supervisor. The Company may resolve the conflict by reassignment or, when necessary, termination of employment. If there is uncertainty regarding whether a position falls under this rule, the Human Resources Center shall make the final decision in accordance with Company policy.

Example: You are the hiring manager for position, and your brother applies for that position.

- 2) **Related-Party Transactions:** You must recuse yourself from representing the Company in business dealings with any enterprise in which your Close Relatives hold key positions. Upon identifying any potential related-party transaction, you must immediately disclose it in full to your department's vice president and the Inspection and Investigation Division. Related-party transactions involving senior management or Board members must undergo review strictly in accordance with the Company's related-party transaction policies and procedures, and appropriate measures shall be taken (including but not limited to information barriers, abstention from voting, independent evaluation, etc.). The Company will disclose related-party transactions to the extent required under applicable accounting standards, laws, regulations, and securities market rules.

Example: Your son is the sales director of one of our key suppliers.

C. External Activity Conflicts

- 1) **Secondary Employment (Part-time Work) or External Inventions:** You shall not work for the Company's suppliers, customers, or competitors. Additionally, you shall not engage in any work or provide services to any third party that may adversely affect your job performance or judgment. Furthermore, you shall not engage in any external business activities or inventions that are similar to your primary job responsibilities or that constitute (or could potentially constitute) competition with the Company. Prior to accepting any external employment, you must notify the Intellectual Property and Legal Center as well as the Human Resources Center, and obtain written approval. Such external work must not impair your performance at the Company and must not involve the use of Company time, facilities, or resources.

Example: You provide paid consulting services to the Company's competitors or suppliers outside of your working hour.

- 2) **Serving as an External Director or Supervisor:** Holding director, supervisor, or similar positions in external companies is subject to strict approval procedures. You may not serve as a director or hold similar roles in a competitor without the prior consent of the Company's Board. To serve as a director in a supplier, customer, or other business partner, prior approval from the Chairman of the Company is required. Senior management must also obtain approval from the Board before accepting any new directorship. Any compensation, remuneration, or benefit received for serving as an approved external director must align with the responsibilities undertaken in such role and must be truthfully disclosed in the conflict-of-interest declaration.
- 3) **Participation in Industry Associations and Standards Development:** Participation in industry associations or standards development may create non-financial conflicts of interest and intellectual property risks. Therefore, you must not apply for membership or participate in such activities without prior written approval from the vice president of your department. Any association you intend to participate in must have an established charter and operate in compliance with applicable antitrust laws, which will serve as a key factor in the approval process.

D. Corporate Opportunities and Resources

- 1) **Corporate Opportunities:** You are obligated to always act in the best interests of the Company. It is strictly prohibited to use your position,

internal information, or Company resources for personal gain or to benefit a third party, or to misappropriate any business opportunities that rightfully belong to the Company. Employees may only consider pursuing such opportunities if the Company has explicitly declined them. Senior management must fully disclose such matters to the Board and obtain written confirmation before proceeding; other employees must obtain written confirmation from the Compliance Committee, after which the Chair of the Compliance Committee shall report the relevant matter to the Board.

Example: You learn from an internal meeting that the Company plans to purchase a parcel of land, and you acquire it first with the intention of reselling it to the Company at a higher price.

- 2) **Company Resources:** You are prohibited from using Company equipment, information, systems, or positional influence to handle personal affairs or to pursue personal gain.

E. Conflicts in Third-Party Engagements

Before engaging consultants, agents, or any other third parties, due diligence must be conducted to ensure that they are qualified, reputable, and free from conflicts of interest. All engagement agreements must be documented in writing and approved at the appropriate level.

7.1.3 Reporting and Management Procedures

Once you become aware of any actual, potential, or perceived conflict of interest, you must promptly report it in writing through the designated channels to your vice president and the Human Resources Center. All completed disclosure and approval documents will be centrally filed and retained by the Human Resources Center. Timely and comprehensive disclosure is a fundamental requirement of the employee's duty of loyalty. Upon receiving your disclosure, the Human Resources Center will work with you and your direct supervisor to objectively assess the situation, determine whether a conflict of interest exists, and evaluate the potential impact on the Company's business.

If a conflict of interest is confirmed, the Company will take necessary risk-mitigation measures based on the specific circumstances, which may include, but are not limited to, recusal from decision-making, information isolation, duty adjustment, divestment of financial interests, or termination of external relationships.

7.2 Insider Trading

In the course of your work, you may have access to material non-public information regarding the Company or our business partners (for example, upcoming financial reports, major merger or acquisition plans, or the signing of significant contracts). Consultants and other individuals engaged to provide services to the Company may also come into contact with such information. Before this information is publicly disclosed, using it to buy or sell stocks or other securities for yourself or others, or “tipping” such information to anyone else, constitutes illegal insider trading. The Company adopts a zero-tolerance policy toward such conduct. If you have any doubt as to whether you possess inside information, you must consult the Intellectual Property and Legal Center immediately.

7.3 Books□ Records and Information Disclosure

The Company’s books, records, and accounts must accurately, truthfully, and completely reflect all transactions and events in reasonable detail, comply with applicable generally accepted accounting principles and relevant laws and regulations, and operate under a sound and effective internal control system. All documents must be properly retained. The establishment of any form of “off-the-book accounts” is strictly prohibited. It is strictly forbidden to falsify or tamper with accounting records. No supplemental or “side agreements” may be executed without proper reporting and approval. All agreements must be signed by duly authorized representatives in accordance with the Company’s contract execution procedures.

External information disclosure to stock exchanges, investors, and regulatory authorities must be truthful, accurate, complete, timely, and easy to understand, and must be released only through designated Company channels and authorized spokespersons. The Chief Executive Officer, Chief Financial Officer, and other financial management personnel hold primary responsibility for the accuracy and completeness of publicly released financial information and the effectiveness of internal controls. They must perform their duties with integrity, adhere to the highest professional and ethical standards, strictly comply with applicable laws and regulations, and ensure timely identification and reporting of material misstatements, control deficiencies, or potential compliance risks.

All employees must respond to disclosure-related inquiries within their authorized scope in a timely and accurate manner, fully cooperate with audit and compliance reviews, and immediately report any discovered or reasonably suspected violations. Breaches of this section will be subject to disciplinary action in accordance with Company policies, and any suspected illegal conduct will be

referred to relevant authorities in accordance with the law.

7.4 Use of Company Assets

All Company assets, including equipment, systems, funds, intellectual property, and other resources, may only be used for legitimate and lawful business purposes.

Employees should use and protect Company assets prudently and economically, and ensure that all business expenses are compliant with internal policies, with reimbursement documents being true and accurate. Any employee who discovers potential loss, misuse, or theft of assets must report it immediately.

The Company provided equipment, networks, systems, and accounts (including but not limited to email, voicemail, and internet access) are Company property and intended solely for lawful and compliant business use. Employees fully acknowledge that should be no personal privacy in using such provided assets. The Company reserves the rights to conduct all required monitoring, review, or access in accordance with this Code along with the applicable laws and regulations. For the purposes of system maintenance, preventing or investigating misuse, ensuring software compliance, responding to legal or regulatory requests, or ensuring business continuity during employee absence, the Company may access the content of Company-provided devices, systems, or accounts without prior notice. Employees must properly safeguard all equipment, refrain from installing unauthorized software, and return all Company assets, along with any data stored on those assets, upon resignation or a change of position.

Chapter 8: Reporting, Investigation and Discipline

8.1 Reporting Channels

The Company encourages employees to speak up and promptly report any suspected or actual violations of this Code. Multiple safe and confidential reporting channels are available, including:

- **Direct supervisor**
- **Compliance Committee**
- **Anti-bribery Hotline (+86 13144861180)**
- **Anti-bribery Email: justice@luxshare-ict.com**
- **Internal Online Reporting Platform**

Reports may be made on a named or anonymous basis. All channels support

multilingual communication and are accessible across time zones.

8.2 Scope and Timing of Reporting

The Company promotes a culture of "report when in doubt." Even if you only suspect that a certain behavior may violate the Code, you should report it immediately, including situations where you believe you have not received adequate resources or training to ensure compliance. Early reporting enables the Company to intervene promptly before issues escalate. However, fabricating facts or maliciously accusing others is strictly prohibited and will be subject to severe disciplinary action if verified. Failure to fulfill reporting obligations also constitutes a violation of the Code and may result in disciplinary measures, including termination of employment.

8.3 Anti-Retaliation Policy

The Company solemnly pledges: All information regarding any bona fide whistleblower, employee participating in investigations, or reported matters shall be kept strictly confidential and disclosed only to necessary personnel. The Company strictly prohibits any form of retaliation. Any retaliatory actions, once verified, will be dealt with severely.

Retaliation under this Code includes, but is not limited to, any interference, restriction, punishment, discrimination, coercion, or harassment related to the report.

This anti-retaliation policy is designed to protect *bona fide* whistleblower; however, it does not exempt a reporter from any responsibility they may bear due to their own negligence.

8.4 Investigation and Handling

The Company will conduct timely, independent, and impartial investigations into all reported matters. The investigation process will be strictly confidential, and information will be disclosed only to the extent necessary for conducting the investigation and implementing remedial measures. If the investigation confirms a violation, the Company will impose appropriate disciplinary actions based on the nature and severity of the misconduct, including but not limited to warnings, demotions, or termination of employment. At the same time, the Company will take reasonable measures to prevent any further violations. For actions that may constitute violations of law, the Company will fully cooperate with relevant government authorities, refer the matter to judicial authorities, and reserves the right to pursue legal liability and financial compensation.