

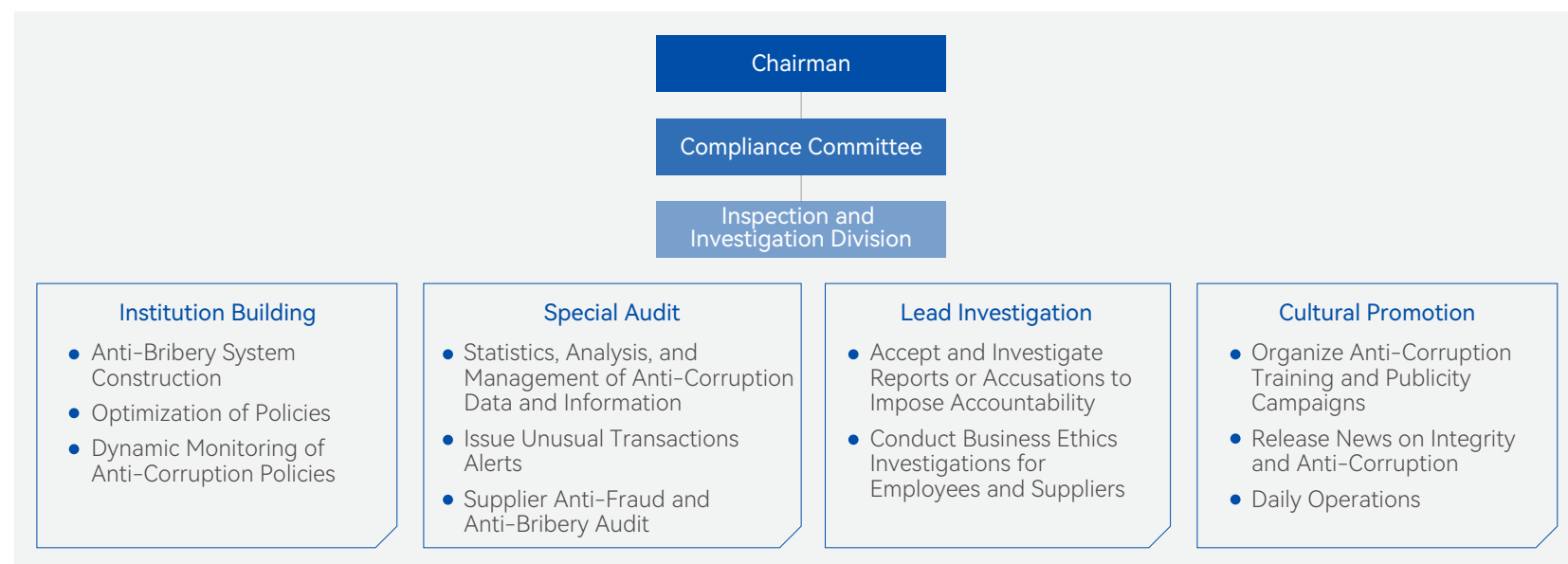
Building a Foundation of Integrity

Luxshare Precision has always adhered to the anti-fraud and anti-bribery policy of "Integrity, Honesty, and Zero Tolerance for Corruption," integrating the concept of open and transparent integrity into its corporate culture and striving to maintain a credible and orderly market environment. We remain committed to opposing corruption by improving policies, strengthening management, and deepening education to continuously enhance employees' business ethics awareness and contribute to the construction of a good market order.

Business Ethics Governance

Luxshare Precision firmly opposes any form of corruption. To effectively advance business ethics governance, the Company has established a three-tier business ethics governance structure under the oversight of the Chairman of the Board and CEO.

Business Ethics Governance Structure



The Company strictly complies with business ethics-related laws and regulations, including the *Company Law* and the *Interim Provisions on Prohibiting Commercial Bribery*. It has formulated and implemented a series of policies and procedures, such as the *COC*, *Luxshare Precision Supplier Code of Conduct*, *Code of Ethics Procedure*, *Employee Integrity Management System*, and *Procurement Business Ethics Management System*. In 2025, the Company comprehensively revised the COC to respond to changes in external regulatory requirements. This revision strengthens management over key risk areas including international trade compliance, artificial intelligence (AI) usage, human rights and safety, while standardizing management responsibilities and requirements for gift approval and asset and data utilization. **During the Reporting Period, Luxshare Precision obtained ISO 37001 Anti-Bribery Management System certification.**

To ensure the effective operation of the system, the **Company conducts an audit of ethic standards covering all BGs and BUs every two years** to ensure governance requirements are implemented. In 2025, the Company was involved in one concluded case of corruption, bribery, and embezzlement. The matter was handled in accordance with relevant regulations, posing no significant risk to operations.

Integrity Culture Development

The Company actively cultivates an integrity culture by conducting **business ethics training for all employees (including part-time staff and contractors) and all suppliers** through various forms. In 2025, the Company conducted 17 offline anti-corruption and integrity training sessions focused on management personnel.

Business Ethics Training and Culture Building

Training Support

- Invite internal and external experts with professional expertise and experience to conduct trainings
- Organize and implement various training and knowledge-sharing programs for all employees, managerial staff, suppliers, and other stakeholder groups in China and international locations
- Arrange and encourage employees to study the most recent information and updates concerning anti-corruption and commercial bribery

Cultural Promotion

- Send the *Integrity Notification Letter* to all employees via email every month.
- Send *Luxshare Precision's Commitment on Anti-corruption* to suppliers through the platform every month and during holidays
- Regularly publish articles to promote awareness through "Integrity Luxshare" section

Assessment and Management

- Employees are required to fill out and sign the *Employee's Voluntary Declaration* and the *Employee's Letter of Integrity Commitment*
- Suppliers are required to fill out and sign the *Supplier's Voluntary Declaration* and the *Letter of Integrity Commitment for Supplier*
- Integrate COC into the quarterly training and assessment for employees at major production bases, and the assessment results will directly affect their performance appraisal and promotion opportunities



Case | Luxshare Xuancheng Conducted Anti-Corruption Training

In August, Luxshare Xuancheng organized anti-corruption thematic training for 74 managers to convey the Company's clear stance against corrupt practices. During the training, participants viewed integrity education videos and listened to analyses of typical disciplinary violation cases along with warning education sessions, gaining a deep understanding of the consequences and impacts of such violations. This training further strengthened employees' integrity awareness and legal concepts, conveying the behavioral requirements of 'fearing consequences in one's heart, exercising caution in speech, and stopping actions when necessary'.



Anti-Corruption Training

Whistleblower Management

We actively encourage employees and stakeholders to report any non-compliant behavior or violations of the ethics code through multiple channels, either in real-name or anonymous form, and have established a corresponding reward mechanism for whistleblowing. Upon receiving a report, the Company will establish a special investigation team based on factors such as the nature of the case and the potential scope of impact to conduct investigations in a professional, efficient, and objective manner. **During the Reporting Period, the handling rate of business ethics related complaints reached 100%.**

Reporting Channels

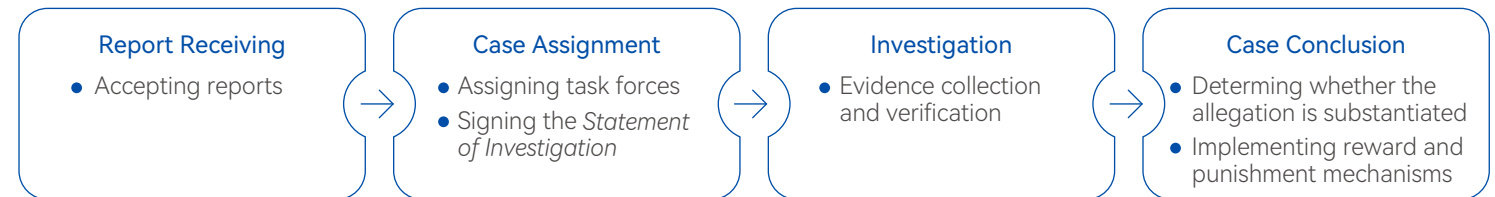
Address : #313 Beihuan Road, Qingxi Town, Dongguan, Guangdong Province, China

Phone : 0769-38800880

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Whistleblowing Management Flowchart



To effectively protect the rights of whistleblowers, we have established the *Whistleblower Protection and Anti-Retaliation Policy*. This policy explicitly states that the Company maintains a zero-tolerance stance against any discrimination or retaliation targeting whistleblowers and commits to protecting those who report.

Whistleblower Protection Measures

Protect the Privacy of Whistleblowers

- Strictly prohibit the unauthorized disclosure of whistleblower-related information
- Designate specialized investigators to handle the reports while keeping them confidential

Avoid Conflicts of Interest of Investigators

- Require investigators to sign the *Statement of Case Investigation Personnel* to ensure they have no conflict of interest with the reported individuals

Seriously Investigate and Handle Retaliation Incidents

- Report any instances of retaliation promptly to the facilities' top supervisor and the Inspection and Investigation Division once they are identified
- Provide legal assistance to whistleblowers



During the Reporting Period, Luxshare Precision:

Total hours of anti-corruption and business ethics training

483,181 hours

Coverage of employee anti-corruption training

100 %

COC exam pass rate

100 %

Signing rate of the *Employee's Letter of Integrity Commitment* or equivalent documents

100 %

Signing rate of the *Letter of Integrity Commitment* for Supplier or equivalent documents

100 %