Tongwei Co., Ltd.
Business Ethics Code of Conduct

Tongwei Co., Ltd. (hereinafter referred to as "Tongwei" or the "Company") is committed to upholding both commercial value and social responsibility, and is dedicated to conducting business with higher ethical standards. With the philosophy of “Honesty, Trust, Fairness, and Excellence”, Tongwei adopts a "Zero Tolerance" attitude towards all kinds of violations of business ethics. In strict compliance with law and regulations as well as a code of business conduct, prompting the company and all stakeholders to jointly create a fair, just, transparent, and clean business environment, and establishing a mutually beneficial business ecosystem.

1. Purpose

The purpose of this code is to outline the policies that the company has adopted to implement the concept of business ethics, maintain high standards of integrity, and uphold business ethical standards.

2. Applicability

This code applies to all board members, management, and all employees of the company and all its branches and subsidiaries. Here, "employees" refer to full-time employees who have signed formal labor and service contracts with the company, as well as interns. We encourage suppliers, contractors, partners, and other

stakeholders who do business with the company to actively comply with this code.

3. Management measures of Business ethics

(1) Anti-corruption and anti-bribery

In the process of operation, Tongwei always insists on the business commitment of integrity and responsibility, pursues the principle of integrity, and strictly abides by laws and regulations, to promote the sustainable development of the enterprise. According to the company's policy, all employees are prohibited from engaging in any form of corruption or bribery, we have established the following regulations:

- Do not accept benefits: Employees are prohibited from seeking cash or cash equivalents, gifts, business banquets and entertainment, positions, contracts, services or other benefits from any person for themselves or others in the execution of the company's affairs, so as to affect fair trade and damage the company's interests and reputation.
- Do not provide benefits: Employees do not directly or indirectly offer benefits to any person or company with whom the Company does business for the purpose of obtaining or retaining business, seeking business opportunities or competitive advantages, or obtaining improper benefits. Do not attempt to influence the decision-making of the Company and relevant partners through relevant actions.
- Suppliers and partners: Tongwei requires suppliers and partners to sign the "Anti-Commercial Bribery and Compliance Commitment", hoping to conduct business activities and dealings with them in good faith and legally, actively comply with relevant laws and regulations and the relevant requirements in this Code, and jointly build a clean and honest cooperation environment. All employees of the Company must take all reasonable steps to ensure that all the partners have been informed of the anti-corruption and anti-bribery principles of this Code and are encouraged to apply these principles to their business practices.

(2) Conflict of Interest

Tongwei strives to avoid conflicts of interest in its business operations, and encourages employees to make reasonable and fair decisions. All employees must recognize that personal relationships may affect objectivity, and in cases of suspected conflicts of interest, they must promptly disclose to the compliance management department any actual or potential conflicts of interest. Situations of conflict of interest include but are not limited to:

- Any situation that may lead to a conflict of interest with the duties of the job or harm the interests of the company, such as relationships with current or potential customers, suppliers, contractors, and competitors.
- Working for other companies or institutions while employed by the company, or accepting part-time work (including unpaid activities) without the company's arrangement or approval. Employees (excluding non-executive directors) who hold part-time positions in other companies or institutions must comply with the company's management regulations and must obtain written permission from the company before employment.
- Representing the company in transactions that may affect the company's interests with suppliers or other partners in which the employee or a specific related person holds shares or positions.
- Misuse of the company's resources or influence to promote or assist other external businesses or non-profit activities.

(3) Competition and Anti-trust

Tongwei is committed to free and fair market competition and complies with all applicable competition and antitrust laws. Employees of the company must compete fairly with their competitors, aware that unfair competition that disrupts market order may result in heavy fines and even criminal liability. The Company requires suppliers and partners to sign an “Supplier Compliance Commitment” to ensure compliance with competition and anti-monopoly laws. Common anti-competitive

conduct that may violate competition law includes, but is not limited to:

- Enter into any illegal agreements and agreements with competitors, such as pricing manipulation, market sharing, tender manipulation, and customer allocation manipulation agreements.
- Exchange sensitive business information with competitors in violation of competition law.
- Impose restrictions on customers or suppliers.
- Abuse of dominant market position.
- Fabricating and spreading false information and other defamatory acts that damage the goodwill and reputation of competitors.

(4) Anti-Money Laundering（AML）

Tongwei complies with the Anti-Money Laundering Law of the People's Republic of China to prevent and curb money laundering activities in which criminal proceeds and their derived benefits are concealed or disguised in any way. We continuously strengthen our internal AML compliance management to ensure business operations remain fully compliant and to safeguard financial security. The Company actively cooperates with law enforcement agencies, regulatory authorities, and the financial industry to jointly combat money laundering. We also organize regular training programs to enhance our employees' awareness and understanding of anti-money laundering practices, enabling them to accurately implement our AML policies.

(5) Responsible Marketing

Tongwei requires all employees to follow business ethics and social responsibility in sales and marketing practices. To ensure that legal, clear, authentic product marketing content is communicated to customers and society, and a good brand image is established. With this in mind, the company particularly commit that:

- Will not make false or misleading statements about the products, services or data performance of the company and its competitors, and will not lead customers to believe untrue information.

- Fully respect and protect the privacy and data of customers.
- Actively carry out customer education activities to improve customers' ability to evaluate and compare products and services, and guide them to make rational purchasing decisions.
- All marketing campaign materials must be approved by authorized managers to ensure accuracy and compliance.
- Regularly audit marketing and sales operations to ensure that sales and marketing practices related to products and services are legal and compliant.

(6) Business Ethics Supervision and Audit

The Supervision and Audit department of Tongwei is responsible for monitoring the implementation of this code to ensure its effective implementation. The company completes an audit and investigation on the content set out in this code every three years, covering all business lines of the company. Employees must consciously accept and actively cooperate with audits and investigations. Any violation of the code of business ethics will be subject to disciplinary action in accordance with relevant laws and regulations and company regulations.

(7) Business Ethics Training

All senior management and all employees of Tongwei are required to participate in the annual business ethics and anti-corruption training conducted by the Supervision and Audit department, and all employees are required to sign the "Supplier Compliance Commitment".

All partners and suppliers doing business with the company are required to attend the Company's annual business ethics and anti-corruption training, and sign the “Anti-Commercial Bribery and Compliance Commitment” to show that they understand and comply with the company's relevant business ethics code of conduct.

(8) Commercial Confidentiality Provisions

Tongwei strictly complies with applicable laws and regulations regarding privacy/data protection and information security, and properly uses confidential information to ensure that the privacy of all employees and business partners is effectively protected. The company has issued a confidentiality policy and signed a "Confidentiality Agreement" with employees, and employees shall not use any social media tools in any way that will cause damage to the reputation of the company, disclose confidential information, violate the privacy of colleagues or business partners of the company, imply that the company agrees with certain personal opinions or violate relevant laws or regulations. The company and the required suppliers and partners have signed a "Confidentiality Agreement", the parties will not share or seek each other's confidential information.

(9) Complaints and Reports

It is the responsibility of all Tongwei employees to report any actual or suspected misconduct in relation to the Company (including any possible violation of this Code) through the relevant channels. The company encourages anonymous reporting, and all reports of misconduct will be investigated by the reporting department and dealt with seriously if necessary.

- The scope of reporting includes, but is not limited to:
  - Violation of legal or regulatory requirements.
  - Fraud, fraudulent activities and other improper conduct related to financial reporting, internal controls, accounting and auditing matters.
  - Bribing within the company or accepting bribes from external parties.
  - Abusing company resources or engaging in other actions that result in losses to the company.
  - Endangering personal health or safety.
  - Using commercial sensitive data improperly or violating information security regulations.
  - Misconduct or unethical behavior that may damage the company's reputation.

- Reporting content:

Reporting persons must provide true details (including relevant events, dates, locations and any other relevant information) and evidence (if any) of the reported matters. All reporting content will be confidential and only provided to the reporting department or authorized investigators for investigation purposes.

- Grievance and Complaint Procedure:
  - Upload the reporting information: complaints and reports can be made through the official complaint channels.
  - Register the reporting information: receivers register and fill in the information in a timely manner.
  - Formulate the investigation plan: responsible department formulates an investigation plan and assigns tasks.
  - Investigate and feedback: the reports are followed up by specialized personnel for investigation and timely feedback.
  - Terminate the investigation acceptance: file for record and terminate the complaint process.

If there is a dispute with the outcome of the investigation, the investigation will be escalated to a second investigation process:

- If the result is not accepted: start the secondary complaint-handling process.
- Conduct secondary investigation: the result of the secondary investigation is the final.
- Terminate the complaint: file for the record and terminate the process.

In the process of handling complaints and reports, the Company shall strictly maintain confidentiality with regard to all kinds of information received, the progress and results of investigations, etc. All kinds of evidential materials, official documents and investigation reports in the course of investigations shall be kept and archived in strict accordance with the regulations and shall not be made available to external

parties without formal approval.

- Employees or relevant third parties who discover violations or suspect violations of this code may report them through the following channels to the reporting department:
  - Reporting telephone 1: 028-86188834
  - Reporting telephone 2: 028-86188838
  - Tel: 15608175053 (the same for WeChat ID)
  - Reporting E-mail: jcb@tongwei.com
  - WeChat public platform: "Lianjie Tongwei"
  - Mailing address: Supervision Department, Tongwei International Center, No.588, Middle Section of Tianfu Avenue, High-tech Zone, Chengdu, Sichuan Province
- The company will publish reporting methods through various channels (including but not limited to the company website, internal notifications, "Lianjie Tongwei" WeChat public number, annual reports, ESG reports, etc.)
- Reporting Rewards:

Anyone who reports a problem that is verified upon investigation will be rewarded in accordance with the company's relevant management policies. Participants in various types of violations who actively report such violations to the relevant departments in a timely manner may be subject to reduced or suspended penalties, and rewarded in accordance with relevant management policies. Reporting rewards will be paid in a confidential manner.

- Promotion of Reporting Channels:

To ensure all employees fully understand the reporting channels and their proper application, the company promotes these channels through various methods, including the official WeChat account, the company's information platform, training sessions, and more. This approach ensures all employees are informed of all reporting mechanisms, procedures, and guidelines, guaranteeing every employee can exercise their right to report conveniently and effectively, thereby collectively

fostering a work environment built on integrity and self-discipline.

(10) Protection for Reporters

Tongwei commits to strictly protecting the relevant information of each whistleblower in accordance with the law. Without the reporter's consent, their identity will not be disclosed unless required by applicable laws and regulations or a relevant court issues a command or order.

Company employees are not allowed to discriminate against or retaliate against reporters. If anyone harasses, discriminates against, retaliates against or hurts a reporter, their behavior will be deemed as serious misconduct, and the company reserves the right to take appropriate actions. If a reporter believes that they have been retaliated against, they should immediately report the behavior and provide relevant evidence.

Reporters should be objective and truthful when reporting matters and be responsible for the authenticity of the information provided. They are not allowed to fabricate or distort facts and must not harm the company's interests and the legitimate rights of other employees. For those who maliciously make false reports, the company reserves the right to take appropriate actions against them and relevant individuals. For internal employees, disciplinary action will be taken in accordance with company regulations.



CEO：Shuqi Liu

Tongwei Co., Ltd.

Date: July 2025

Remarks:

1. The company encourages and supports suppliers and partners to adopt and implement additional principles and policies, provided that they do not conflict with this policy.

2. The company's business operations strictly comply with the local laws and regulations. In the absence of specific local legal requirements, this policy shall be followed.

3. This document is interpreted and revised by Tongwei Co., Ltd. The company will update the document in a timely manner based on domestic and international policies, regulatory requirements, and industry developments. In the event of any inconsistencies between the Chinese and English versions of this document, the Chinese version shall prevail.