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# Employee Code of Business Conduct

## I. Overview

This *Code of Business Conduct* (the "*Code*") has been prepared by the Company based on management needs and pursuant to effective applicable laws. As a general business conduct guideline, the *Code* provides legal and compliant ethical behavior standards for our employees. The Company's employees are expected to follow the law and this *Code*, maintain integrity, and grow together with the Company to promote the sustainable development of both themselves and the Company.

## II. Code of Conduct

### 1. Legal Compliance

Employees shall comply with all effective national laws, regulations, policies, and international business practices and work in full compliance with the law. Such laws, practices, and standards cover areas including without limitation investment, trade, import and export, foreign currency exchange, employment, environmental protection, contracts, consumer protection, intellectual property rights, accounting, and taxation.

#### 1.1 Competition Laws

The Company is committed to engaging in fair market competition and each of its employees is obligated to abide by applicable competition laws and local government regulations when dealing with business partners or third parties. Our employees are, in principle, prohibited from executing any restrictive agreements with competitors, customers, suppliers, or distributors that limit the Company's regular business operations. Employees must first obtain authorization from Company management prior to engaging in any business negotiations, especially with Company competitors.

#### 1.2 Anti-Money Laundering

All employees are obligated to follow the anti-money laundering laws established by the local government. Employees must fully understand who they are partnering with, their partner's business environment, and the purpose of the transaction prior to engaging in any business transactions.

#### 1.3 Import and Export Regulations

Employees shall comply with the export control and customs regulations of the country/region where the Company operates. Employees tasked with service, software, or technology of import and export are obliged to comply with all applicable laws, appropriate working guidelines, and procedures in effect.

#### 1.4 Environmental Laws

The Company complies with all applicable local environmental laws and policies. Every employee should follow environmental laws, promote environmental protection awareness, and develop good environmental protection habits to protect our environment rather than destroy it. Employees shall consult the Company legal department whenever they are unsure whether the activities they are about to engage in violate applicable laws prior to engaging in such activities.

## 2. Prohibition of Commercial Bribery

## 2.1 Preventing Corrupt Practices

The Company is committed to attracting customers through high-quality products and high-value services and opposes any form of commercial bribery.

Employees are not permitted to use the Company's resources to solicit improper private benefits for themselves or any third parties, nor are they permitted to solicit or accept any improper private benefits (such as money, services, or kickbacks) from any third parties.

Any employees offered improper benefits by business partners must notify both the Ethics Committee and management of the Company.

Company employees are not permitted to offer money or anything of value to suppliers, customers, or employees or directors of other organizations.

## 2.2 Restrictions on Accepting Gifts and Invitations

No employee is permitted to accept any benefits from customers, business partners, or government officials. Invitations to any activities, lunches, dinners, or any other special occasions must be authorized by either the Ethics Committee or management of the Company and subject to the following restrictions:

### Restrictions on Business Entertainment

- Employees must carefully consider whether to accept invitations to business meals or social activities offered by individuals from outside the company. Employees must ensure that expenses for normal business entertainment, including without limitation expenses for meals accepted or provided by employees from or to others, comply with management policies and are not prohibited by any laws or business partners' or suppliers' management policies. Employees shall refuse any invitations beyond the above scope or assume applicable expenses themselves.

### Restrictions on Accepting Gifts

- Employees are not permitted to accept any items or gifts exceeding **[US\$ 50]** in value, including without limitation gifts, gift cards, coupons, gift certificates, or loans.
- Employees are not permitted to accept any bribes and shall avoid doing anything that may cause them to be suspected of such.
- Employees and their families are not permitted to accept any gifts that may adversely impact Company business development.
- Employees are strictly prohibited from directly or indirectly soliciting gifts or receiving improper benefits from business partners.
- Employees are strictly prohibited from accepting kickbacks, commissions, or tips, from business partners.
- Employees who are unable to refuse such benefits under particular circumstances must report to their directors and hand over any benefits accepted to the Company within 1 business day of accepting such.

## 3. Avoiding Conflict of Interest

Although the Company respects the personal interests and private lives of all employees, employees should avoid incidents that may damage Company interests and shall not use the Company for personal gain. Specifically, the Company prohibits the following conflict of interest:

### No Moonlighting at Company Suppliers

Unless otherwise approved by Company management in advance, employees are not permitted to act as Company suppliers or their representatives, nor are they permitted to work for the suppliers, or to serve as their employees, consultants, members on their board of directors, or shareholders. Employees are not permitted to accept money or any other form of benefits for providing suppliers with advice or services for Company operations.

### No Competing with the Company

Employees must not sell products or services in any forms that compete with the Company's current or future products or services. Employees shall consult Company management whenever they are unsure whether the activities they are about to engage in conflict with Company interests prior to engaging in such activities.



**No Assisting Company Competitors**

Assisting current or future Company competitors constitutes a clear conflict of interest. Employees are not permitted to work for Company competitors, serve as their consultants, members on their board of directors, or provide them with services in any other way, nor may they provide competitors with any Company information.

**No Secondary Occupation**

Employees must not engage in any other activities other than Company business in the Company office or during working hours and shall not use Company assets (including devices, resources, and information) to engage in such. Employees may only engage in part-time work at other companies or hold similar positions (such as on the management committee, oversight committee, or advisory committee) after obtaining approval from Company management. Employee part-time work may be prohibited if:

- It adversely impacts an employee's regular work.
- It conflicts with the employee's duties in the Company.
- There is a risk of conflict of interest.

In some cases, an employee's spouse or a close relation of the employee may be a Company competitor, supplier, or be employed by them. While the Company respects everyone's right to choose their own career, the above situations may cause issues regarding Company information security, confidentiality and conflict of interest. Therefore, employees facing the above circumstances are encouraged to inform their immediate supervisors and the human resources department so that they may assess the nature of the issues and resolve any issues.

Employees shall first consult the Company legal department if they are unsure whether any matters they are engaged in conflict with Company interests.

**Close Personal Relationships within the Company**

Maintaining close personal relationships with direct or indirect superiors or subordinates.

Employees working in specific departments, such as the HR, finance, and legal departments, may not maintain close personal relationships within the Company.

Such relationships include both those that existed before and those that were established after the employee began employment with the Company.

Close personal relationships refer to: romantic relationships, spousal relationships, in-law relationships, sibling relationships, and cousin relationships.

## 4. Careful Selection of Business Partners

Employees shall comply with applicable laws, respect human rights, and abide by the social norms recognized by the Company when collaborating with business partners. The relationship with partners who have been found to have violated applicable national laws or international conventions, concealed their true identities or ownership structure, engaged in money laundering or financial terrorism, or who have failed to take appropriate action to correct such acts shall be refused or terminated.

We expect our suppliers to participate in Company procurement activities in compliance with appropriate procedures. All factors shall be considered without bias when selecting suppliers. Suppliers must be selected in the best interests of the Company and in compliance with Company supplier management guidelines and procurement procedures. Furthermore, the principle of fairness shall be adhered to regardless of the scale of the procurement. Employees shall consult the appropriate supervisors and the Company finance department in case of any uncertainties about the procurement.

The Company's contract execution process and authorization system have been set up to protect Company assets, provide appropriate management controls, and ensure healthy and sustainable Company operations. No employees may make commitments or agreements, commercial or otherwise, beyond the scope of due process and authorization, including without limitation entering into new contracts or amending executed contracts. Employees shall not make any misleading statements or misrepresentations to any third parties when engaging in business activities. Employees shall consult the Company legal department in case of any doubts about any contracts.

## **5. Maintaining a Positive Working Environment**

### **5.1 Promoting Equality and Mutual Respect Among Employees**

The Company operates internationally and employs individuals from various countries/regions. The Company prohibits the attack, discrimination, harassment, or exclusion of any employees due to their race, skin color, nationality, religious beliefs, ideology, gender, age, disability, marital status, political affiliation, or sexual orientation. The Company opposes any form of discrimination, bullying, sexual harassment, physical violence, physical coercion, or verbal abuse.

### **5.2 Lead by Example**

The Company is committed to creating a working environment in which employees are treated with equality, respect, trust, and fairness, and are offered great career development opportunities. Company managers should lead by example. They should leverage their sophisticated management skills to guide their subordinates and create a healthy working environment.

Supervisors should fully trust their subordinates and assign them as many responsibilities as possible while allowing them the necessary freedom, setting specific and realistic goals, recognizing their achievements, and providing them with enough room for creativity and innovation. All Company managers are responsible for preventing inappropriate behavior and effectively supervising and caring for their subordinates within the scope of their responsibilities to ensure that they do not violate any laws or company policies.

### **5.3 Promoting Employee's Health and Workplace Safety**

Ensuring workplace safety and employee's health are key Company goals. The Company is committed to achieving the above goals by continuously improving the working environment and through various prevention and health-care activities.

Every employee is obligated to act prudently to avoid risking their health.

### **5.4 Employees Under the Influence of Controlled or Illegal Drugs Are Prohibited From Reporting to Work**

Employees are prohibited from working or appearing on Company premises under the influence of controlled or illegal drugs or alcohol. Employees shall not consume alcohol during work.

Controlled substances regulated by the government shall not be brought onto Company premises.

## **6. Company Assets and Information Security**

### **6.1 Protection of Company Assets**

Employees should always use Company equipment properly and carefully to prevent its loss, theft, damage, or misuse. Company equipment may only be used for work purposes and must not be used to engage in illegal acts or steal Company secrets.

### **6.2 Trade Secrets and Intellectual Property Rights**

Business information is essential to the Company. Employees who know or have access to sensitive information/trade secrets belonging to the Company or Company business partners shall neither disclose such to any third parties (including family members, friends, or acquaintances) nor use it for any purposes other than Company business.

Furthermore, employees should respect the Company intellectual property rights (including without limitation patents, trademarks, copyrights, and trade secrets) and information security policies to protect and ensure legal use of the Company's intellectual property rights. Unless otherwise authorized by the Company, such information shall not be used, copied, distributed, or leaked.

Employees may consult the Company legal department if they believe that the information they hold may be third party's confidential information or are unsure how to use Company information.

### **6.3 Information Security**

Employees are strictly prohibited from publicly disclosing, changing, or destroying any Company information without the Company's prior authorization. Employees are required to securely process any information they have access to.

Employees should promptly report any suspicious or potential attacks or issues they are unsure how to resolve to the IT department.

Employees should refer to the Company legal department if they receive any requests for information on Company operations from lawyers, law enforcement agencies, government agencies, or other investigative or executive agencies.

### **6.4 Handover of Assets and Information**

Employees must hand over all company assets in their possession, including without limitation documents and any media containing Company information, back to the Company and shall not disclose nor use Company information when they leave the Company, regardless of the reason for their leaving. The Company shall continue to own the rights to intellectual property created by employees during their employment period subsequent to their termination. Terminated employees shall not take with them or use any Company assets, documents, codes, technologies, or other Company information when leaving the Company, even if they generated or created said assets or information during their employment period.

## **III. Observing the Code of Business Conduct**

### **1. Keep Up-To-Date with the Latest Code of Conduct**

The Code or specific Company business policies may be interpreted or applied differently as the Company continues to develop. The Company will promptly revise the Code based on current conditions and provide regular training to inform employees of updates to the Code of Business Conduct and any legal compliance requirements. All employees are obligated to promptly review any updates to the Code and participate in the related training as required by the Company. Employees who have concerns about the interpretation or application of the Code or specific business policies are welcome to discuss such with their immediate supervisors, the legal department, the human resources department, or the Ethics Committee:

Email: [ECC@ushareit.com](mailto:ECC@ushareit.com)

### **2. Reports on Inappropriate Behavior**

Employees found to have violated or be currently in violation of the Code of Business Conduct, Company guidelines, or the internal management system may be reported in the following methods:

- By notifying an immediate supervisor/human resources department;
- By reporting the violation to members of the Ethics Committee;
- By openly or anonymously sending a report to: [ECC@ushareit.com](mailto:ECC@ushareit.com). The Company will carefully investigate the matters described in the report and will not permit any retaliation or threats against reporters. Furthermore, the Company is committed to impartially dealing with any employees accused of misconduct.

The above reporting methods have also been made available to Company suppliers, customers, and other third parties.

### **3. Resolving Illegal Acts in an Impartial and Reasonable Manner**

If reports are found to be true, the Company will take strict action and resolve any violations in compliance with applicable laws and Company policies. Moreover, the Company commits that the resolution process will be fair and impartial, with only necessary and reasonable actions being taken, and employee supervision is welcome.

**This Code shall take effect as of the date it is issued.**