



Compliance Code of Conduct

Chairman's Message:

Dear colleagues,

In the era of the digital economy, with the closer integration of industrialization and digitization, the increasing economic interactions among countries worldwide highlight the crucial importance of accelerating compliance management in business operations. For sustainable and healthy development with international competitiveness, it is imperative for enterprises to establish their own compliance management systems, ensuring that every step of their business development follows established rules.

Over the years, Smart Tech has adhered to a global brand strategy. A brand is the soul of a company, acting as a fortress, a passport to global presence, and a driving force for continuous development. We take pride in our ability to help improve the quality of life and enhance health for millions of users in China and around the world. Throughout our business operations, we have consistently pursued the vision of becoming a globally trusted, respected, and continuously developing enterprise. We actively embody the core values of innovation, win-win cooperation, hard work, and efficiency, demonstrating our respect and responsibility towards ourselves, our customers, and society through tangible actions. Today, the expansion of Smart Tech's business sectors owes much to the guiding principles of compliance.

As the saying goes, clear rules lead to proper conduct, and proper conduct leads to revolution. At Smart Tech, the code of conduct for all employees represents the company's image, making standardized behavior crucial. This is the mission of Smart Tech's compliance management, and we must firmly remember and implement it. The philosophy of compliance must be integrated into every position and every specific task. Only when everyone adopts a compliant business posture and strives diligently can we create a more brilliant success.

A fulfilling life is accompanied by Smart Tech; compliant operations lead to stable development.

Smart Tech upholds strict business conduct guidelines in areas such as business dealings, contract fulfillment, after-sales service, and more, to promote the construction of a sustainable supply chain system.

1. Business Ethics:

Establish and adhere to comprehensive business conduct codes (or similar policies) that prohibit all unethical or illegal business activities. The company must have effective processes and procedures, both internally and externally, to promptly report, identify, and mitigate any improper behavior. Adhere to the highest standards of integrity in all business interactions, adopting a zero-tolerance policy against any form of improper conduct.

2. No Undue Benefits:

Smart Tech makes business decisions based on business performance and does not promise, provide, grant, give,



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or accept bribes, or provide any form of benefits to gain illegal or undue advantages. This includes personal relationships, gifts, favors, hospitality, commissions, personal loans, etc. The company prohibits involvement in bribery or kickbacks in any business activities, directly or indirectly, by any employee, consultant, agent, or representative of the company. Illegally obtained gains from violating integrity regulations must be returned, and compensation must be provided for resulting economic losses.

3. Conflict Minerals:

Smart Tech ensures that metals such as gold (Au), tantalum (Ta), tin (Sn), tungsten (W), and cobalt (Co) used in its products do not directly or indirectly fund armed groups violating human rights in the Democratic Republic of Congo or neighboring regions. The company conducts due diligence on the sources and supply chains of these minerals and provides its customers with information on their due diligence measures upon request. It also prohibits violating relevant export control laws and regulations, ensuring that controlled items are not provided to restricted countries or entities without the necessary permits, and refrains from engaging in sanctioned industries in sanctioned countries or regions.

4. Labor:

Smart Tech commits to upholding employees' human rights in accordance with internationally recognized standards, abiding by a fundamental human rights policy and providing dignity and respect to its workforce. The company complies with local laws, offering equal employment opportunities to all employees and job applicants and ensuring equal opportunities for promotion, compensation, training, transfer, leave, and other rights and benefits related to job assignments. The company does not tolerate any harassment, coercion, verbal insults, or discrimination based on race, color, religion, belief, gender, sexual orientation, gender identity, or any other legally protected basis. It does not employ child or forced labor at any stage of production or operation. Work arrangements and wage payments comply with local laws, including regulations on minimum wage, overtime, and statutory benefits. Respect for employees' rights to voluntarily form and join unions, engage in collective bargaining and peaceful assembly, and refuse to participate in such activities is ensured.

5. Health, Safety, and Environment:

Advocate for industry systems audits, such as safety standardization and occupational health and safety management. Ensure that products comply with national industrial policies and guarantee the legality of product manufacturing and use, as well as the reliability of operational technologies. Prioritize the implementation of health and safety measures, meeting or exceeding all legal standards related to occupational health and safety to reduce work-related injuries and illnesses, improve product and service quality, promote production, increase employee retention rates, and boost employee morale. Ensure that product quality meets national or industry safety standards, eliminating safety incidents caused by product quality. Strengthen safety management during



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delivery, installation, commissioning, or maintenance to ensure the safe completion of contracts.

Implement and deepen the environmental development strategy, promote the green manufacturing concept, and implement comprehensive environmental management in various aspects such as procurement, recycling of solid waste resources, energy conservation, environmental protection, low carbon, and green park construction. Promote green production, green product certification, green logistics, green packaging, and other initiatives.

6.Sustainable Development:

Smart Tech recognizes environmental responsibility as an integral part of producing world-class products. In production and operation, the company strives to minimize or eliminate adverse impacts on society, the environment, and natural resources, protecting public health and safety. Measures are taken to reduce or eliminate the emissions, releases, and generation of pollutants at the source. Controlled use of natural resources, including water, fossil fuels, minerals, and raw forest materials, is prioritized. Alternative materials are actively used, and strategies such as reuse, resource protection, recycling, and other methods are employed.

Identify, label, and manage chemicals and other materials that may pose a danger to humans or the environment, ensuring their safe handling, movement, storage, use, recycling, reuse, and disposal. Adhere to laws, regulations, and customer requirements regarding the prohibition or restriction of certain specific substances in products and manufacturing processes.

7.Confidentiality Principles:

Personnel entering areas under the jurisdiction of the company must strictly adhere to Smart Tech's requirements for mobile phone management, and photography is strictly prohibited throughout the entire process. Non-company personnel are not allowed entry.

Adhere to confidentiality management requirements, and during business transactions, employees must strictly maintain the confidentiality of the other party's business secrets learned or obtained during the contract signing or fulfillment process. Strictly manage according to agreed-upon confidentiality periods, unaffected by the termination, change, or termination of contracts between both parties.

8.Compliance Principles:

Compete in a fair, just, and legal environment, and comply with any applicable competition-related laws and regulations in any country. Comply with laws, rules, and regulations related to the commercial transactions of goods and services in any country.

Agree to information collection activities for compliance due diligence purposes. As business partners, strictly comply with various requirements of relevant compliance management, including: whether it involves export



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controls and economic sanctions; anti-corruption, anti-bribery, and fair trade; ensuring product and service quality; legal employment and labor safety; compliance with fair competition and antitrust laws; anti-money laundering; ensuring safety in production; protecting intellectual property rights and trade secrets; Protect the environment; Personal data protection and data security; Other compliance obligations closely related to the cooperation business or the cooperation content, etc.