

Cheongfuli (Xiamen) Co., Ltd.

Business Code of Conduct

1 Purpose

This Business Code of Conduct is hereby established to advocate professional conduct characterized by integrity and honesty, probity and uprightness, and due diligence, define the baseline conduct and accountability requirements for all employees of Cheongfuli (Xiamen) Co., Ltd. (hereinafter referred to as “Cheongfuli” or “the Company”), prevent all forms of rule-breaking, disciplinary violations, and unethical conduct, ensure that all business activities of the Company are conducted in a lawful and compliant manner, proactively fulfill corporate responsibilities towards the environment and society, and safeguard the interests and reputation of the Company. The Company also encourages and promotes suppliers, contractors, customers, and other business partners to jointly comply with this Code and practice responsible business conduct.

2 Scope

This Code applies to Cheongfuli and all entities over which it has operational control. Each entity may formulate its own business code of conduct based on its actual circumstances, which shall be consistent with this Code.

3 Integrity and Compliance in Business Operations

All employees of the Company shall uphold the baseline of lawful compliance and take compliant operations and honest conduct as the fundamental principles in their daily work, adhere to the ethical standards of integrity, honesty, probity, and self-discipline, conscientiously safeguard their personal professional reputation and the Company’s image, and resolutely refrain from all illegal, non-compliant, improper, or unethical conduct.

4 Anti-Corruption and Anti-Bribery

The Company prohibits all acts of corruption and bribery. No employee of the Company shall accept bribes from others, offer bribes to others, or facilitate bribery, nor shall any employee take advantage of his or her position to provide or accept remuneration or other benefits that may unfairly influence the Company’s business. For acts that violate this policy or relevant anti-corruption and anti-bribery provisions, the Company shall take disciplinary measures in

accordance with laws and regulations, and hold the responsible persons accountable.

5 Free and Fair Competition

The Company complies with laws and regulations relating to anti-unfair competition and anti-monopoly in China and in the countries or regions where it conducts business, advocates the principles of free and fair competition in business activities, and prohibits acts that disrupt the market economic order. The Company prohibits unfair, illegal, or unethical competitive conduct such as infringement of trade secrets and fabrication or dissemination of false information, and conscientiously avoids the occurrence of monopolistic conduct.

6 Avoidance of Conflicts of Interest

Employees shall avoid, to the greatest extent possible, conflicts of interest between personal interests and those of the Company. When faced with a conflict of interest, employees shall promptly and proactively report the matter to the Company and recuse themselves. The Company shall take relevant measures to mitigate the impact of conflicts of interest on the Company and its employees to the greatest extent possible.

7 Anti-Money Laundering

The Company firmly resists money laundering or terrorist activities. All employees shall comply with domestic and international laws and regulations relating to anti-money laundering, and shall not participate in, facilitate, or harbor any money laundering, terrorist activities, or other illegal or criminal activities.

8 Information Security and Privacy Protection

The Company attaches importance to information security and privacy protection, and strengthens information security safeguards by improving information security management mechanisms, conducting regular information security inspections, and promoting the development of an information security culture, so as to prevent unauthorized access, disclosure, loss, and damage to data and information, and protect the privacy of employees, customers, and other stakeholders.

9 Tax Compliance

The Company complies with laws and regulations relating to taxation in China and in the countries or regions where it conducts business, and fulfills its tax obligations in accordance with the law.

10 Environmental Protection

The Company complies with laws and regulations relating to environmental protection, reduces pollutant discharge, strengthens water resource conservation, and improves resource utilization efficiency through the implementation of various management measures, so as to minimize, to the greatest extent possible, the environmental impact of its business activities, and proactively advocates environmental protection concepts and fulfills its environmental protection responsibilities. The Company actively addresses climate change, endeavors to reduce greenhouse gas emissions from its own operations, and also encourages value chain partners to advance green and low-carbon transformation. The Company pays attention to ecological environment and biodiversity conservation, and minimizes the adverse impact of its business operations on the ecological environment and biodiversity.

11 Protection of Labor Rights and Interests

The Company is committed to fostering a diverse, inclusive, fair, and healthy workplace, strictly complies with relevant national labor laws and regulations, and fully safeguards the lawful rights and interests of employees. The Company provides equal opportunities for employees in recruitment, promotion, incentives, and other processes, and opposes differential treatment based on race, religion, age, gender, nationality, or other factors. The Company eliminates forced labor, child labor, slavery or servitude, and human trafficking, and prohibits all forms of discrimination, harassment, violence, insults, bullying, defamation, and other inappropriate conduct. The Company respects and safeguards employees' rights to remuneration, rest and leave, freedom of association, and collective bargaining, and establishes and improves an occupational health and safety management system, strengthens the identification, assessment, and control of occupational health and safety risks, and protects the physical and mental health and safety of employees.

12 Responsible Procurement

The Company advocates the principles of responsible procurement, promotes and encourages suppliers to follow codes of conduct in respect of business ethics, fair competition, human rights protection, safety and health,

environmental protection, and product quality, and to conduct business in a responsible manner.

13 Community Engagement

The Company values community communication, receives and responds to important community issues and complaints, and is committed to establishing community relationships of mutual trust and mutual benefit. The Company respects and protects the rights and interests of indigenous peoples, cultural customs, cultural heritage, and other aspects of local communities, and minimizes, to the greatest extent possible, adverse effects on local communities. The Company pays attention to community development, supports community economic development through measures such as promoting employment, and advances the symbiotic co-prosperity of the enterprise and the community.

14 Reporting and Whistleblower Protection

The Company encourages employees, suppliers, customers, and other stakeholders to report suspected violations of laws and regulations, Company policies and rules, or this Code to the Company. Stakeholders may submit reports, whether anonymously or by name, through the Company's publicly available complaint channels. Company employees may also provide feedback to the relevant departments of the Company. The Company implements whistleblower protection measures, strictly enforces confidentiality mechanisms, and strengthens the protection of whistleblowers. The Company adopts a zero-tolerance approach towards retaliation and shall, to the greatest extent possible, protect whistleblowers from any form of retaliation.

15 Accountability

Where an employee violates this Code, the Company shall impose corresponding disciplinary actions and penalties in accordance with relevant management rules. Where the circumstances are serious, the employee shall be held legally liable in accordance with the law.

16 Effective Date

This Code shall come into effect from the date of its publication.

Cheongfuli (Xiamen) Co., Ltd.

XX XX, 2026