

BOE Technology Group Co., Ltd. Business Ethics Policy (For Trial Implementation)

I. Preamble

Since its founding, BOE Technology Group Co., Ltd. (hereinafter referred to as the "Company" or "BOE") has always held "Righteous Management, Innovation and Progress" as the core principle for sustainable business operations. "Righteous Management" is not only a guide for the Company's actions, but also the cornerstone for winning the trust of customers, partners, and society.

The Company is committed to becoming the most respected great enterprise on earth. We firmly believe that only by conducting all business activities in an honest, fair, and transparent manner can we achieve shared prosperity between the enterprise and society. This policy sets out BOE's fundamental stance and basic commitments in the field of business ethics, and serves as a code of conduct to be observed by the Company and its partners.

II. Scope of Application

This policy applies to all directors, senior management, and employees of the Company and its wholly-owned and controlled subsidiaries. The Company advocates and encourages its associate companies to comply by reference. The Company also encourages and supports its business partners (such as suppliers and distributors) in complying with this policy.

III. Core Values

Integrity and Responsibility – We uphold the bottom line of business ethics, treat every stakeholder with honesty and trustworthiness, honor our commitments, and take responsibility courageously.

Customer Dedication – We are customer-demand-oriented, committed to creating value that exceeds our customers' expectations, and take customer satisfaction as the fundamental criterion for measuring the effectiveness of our work.

People-Oriented – We respect the dignity and value of every employee, create a fair, diverse, and inclusive working environment, and enable every BOE person to realize their self-worth.

Open Innovation – We embrace change with an open mindset, work hand in hand with partners to create together, encourage innovative

thinking, and drive sustainable corporate development through technological and management innovation.

IV. Our Commitments

(1) To Customers

We always adhere to a customer-oriented approach and provide customers with the best user experience through excellent products and services.

We commit to:

- Providing true and accurate product information, without false advertising or exaggerating product functions;
- Strictly controlling product quality to ensure products comply with all applicable safety and environmental standards;
- Respecting customers' intellectual property and trade secrets, and not using or disclosing them without authorization.

(2) To Investors

We are committed to growing together with investors and to building a solid bridge of trust through mutual trust, interaction, and communication.

We commit to:

- Disclosing information that is true, accurate, and complete, without false records, misleading statements, or material omissions;
- Continuously improving the Company's governance mechanisms and enhancing the level of corporate governance;
- Continuously creating value for investors through scientific decision-making and effective management.

(3) To Employees

We have employees from different regions and cultural backgrounds. They share one name—BOE people—and they are BOE's most valuable asset.

We commit to:

- Providing employees with a mutually respectful, harmonious, and ideal working environment;
- Protecting employees' lawful rights and interests, and eliminating all forms of discrimination, harassment, and forced labor;

- Providing employees with equal career development opportunities and training support;
- Having employees sign the BOE Employee Code of Conduct Declaration upon onboarding to clarify professional ethics requirements.

(4) To Suppliers and Partners

We grow together with supply chain partners under the philosophy of "Deep Cooperation, Collaborative Development, and Value Co-creation."

We commit to:

- Establishing open, fair, and transparent procurement and bidding processes;
- Requiring suppliers to follow the highest standards of integrity in all business activities, and prohibiting corruption, bribery, extortion, embezzlement, money laundering, and other such acts;
- Conducting CSR on-site audits of suppliers covering management systems, labor, environment, health and safety, and business ethics;
- Requiring partners to sign the Integrity Agreement, and prohibiting any procurement activity from violating the Procurement Red Lines.

(5) To Society

We actively undertake social responsibility, integrate into local communities, and fulfill our commitment to sustainable social development through contributing to education, supporting environmental protection, and engaging in volunteer and public welfare activities.

We commit to:

- Complying with all applicable laws and regulations in the places where we operate, and being a responsible global corporate citizen;
- Actively responding to climate change and advancing green manufacturing and carbon neutrality goals;
- Respecting and protecting human rights, and prohibiting all forms of forced labor.

(6) To the Environment

We are committed to coexisting with the environment and fulfilling our environmental commitments through green systems, green products, and full-process green operations.

We commit to:

- Adhering to green operations, integrating ecological civilization concepts into product lifecycle management, and strictly complying with environmental laws and regulations in the places where we operate;
- Committing to achieving carbon neutrality across the Group by 2050, and building a full-value-chain low-carbon system through pathways such as green management, green products, green manufacturing, and green recycling;
- Continuously developing green products and technologies, advancing green manufacturing, and forging a green ecosystem.

V. Our Code of Conduct

(1) Integrity in Business

BOE conducts all business activities in an honest, trustworthy, and responsible manner. Integrity is the foundation of our existence and the cornerstone for winning the trust of customers, partners, and society.

We adhere to:

- Providing true and accurate product and service information, without false advertising or exaggerating product functions;
- Recording all business transactions in a true, accurate, and complete manner, without falsification, concealment, or misrepresentation;
- Honoring every commitment to customers, partners, and society, and keeping our word;
- Winning in the market through excellent quality, innovative technology, and superior service, rather than obtaining competitive advantages through improper means.

(2) Promoting Fair Competition

BOE highly values and strictly fulfills its obligations for fair market competition. We advocate winning in market competition through leading technology, innovative business models, and high-quality products and services.

We adhere to:

- Complying with applicable anti-monopoly, fair competition, and anti-unfair competition laws and regulations in the places where we operate;

- Not entering into or implementing monopoly agreements with competitors that are prohibited by law, and not unlawfully exchanging competitively sensitive information such as prices, output, customers, and markets;
- Not engaging in illegal acts such as abuse of market dominance, bid rigging, or false or misleading commercial advertising;
- Following applicable laws, regulations, and Company policies and completing corresponding procedures for matters such as mergers, acquisitions and joint ventures that require merger control filing or review in accordance with the law.

(3) Information Disclosure Standards

BOE adheres to the principles of true, accurate, and complete information disclosure, ensuring that all stakeholders can understand the Company's situation in a timely and fair manner.

We adhere to:

- Disclosing information in a timely and fair manner in accordance with laws, regulations, and normative documents, and ensuring that the information disclosed is true, accurate, complete, concise, clear, and easy to understand;
- Strictly prohibiting false records, misleading statements, or material omissions;
- Ensuring that all stakeholders have equal access to important Company information.

(4) Anti-Corruption and Anti-Bribery

BOE strictly complies with national laws, regulations, and standards on anti-corruption and anti-bribery, and continuously improves the construction of its integrity and dedication system.

We adhere to:

- "Zero tolerance" for any form of corruption and bribery;
- Conducting business fairly, justly, and efficiently, with no bribery, no acceptance of bribes, no solicitation of bribes, and no corruption;
- Prohibiting employees from improperly investing in partner companies or holding economic interests that may affect their independent and impartial performance of duties;
- Requiring that potential conflicts of interest be reported in a timely manner and managed in accordance with Company policies;
- Ensuring that all business transactions are transparent and accurately reflected in the Company's books and records.

(5) Anti-Money Laundering

BOE is committed to strictly complying with anti-money laundering laws and regulations in the places where it operates.

We adhere to:

- Prohibiting employees from participating in, assisting with, or facilitating money laundering or other illegal financial activities in any form;
- Remaining vigilant against risk situations such as abnormal transactions and abnormal fund flows, and reporting relevant risks in a timely manner in accordance with Company policies upon discovery;
- Performing the obligations required by applicable laws and regulations in respect of businesses and entities that are legally subject to anti-money laundering requirements.

(6) Preventing Conflicts of Interest

BOE requires all employees to avoid conflicts between personal interests and Company interests.

We adhere to:

- No use of Company information, property, or position for personal gain;
- No engagement in business activities that directly or indirectly harm the Company's interests;
- Proactive reporting and recusal in the event of potential conflicts of interest.

(7) Prohibition of Insider Trading

BOE strictly complies with securities laws and regulations and prohibits insider trading.

We adhere to:

- Maintaining confidentiality obligations regarding inside information, and not disclosing it externally in any form before it is publicly disclosed in accordance with the law;
- Not using inside information to buy or sell Company stocks or their derivatives, or to advise others to buy or sell Company stocks or their derivatives.

(8) Intellectual Property, Information Security and Privacy Protection

BOE highly values the protection of intellectual property, information security, and privacy.

We adhere to:

- Respecting and protecting the intellectual property of the Company and third parties, and not using it without authorization;
- Strictly complying with confidentiality-related laws, regulations, and Company policies, fulfilling confidentiality obligations, and improving the confidentiality management system;
- Protecting the trade secrets and personal information of customers, suppliers, and other partners, and preventing information leakage and misuse.

(9) Whistleblowing Policy and Whistleblower Protection

BOE has established a comprehensive anti-corruption reporting and investigation mechanism, taken multiple measures to keep the reporting channels open, and effectively built a solid line of defense for integrity-driven operations.

We adhere to:

- Opening diversified channels for reporting fraud or providing leads, and comprehensively publicizing reporting channels through internal notices, external announcements, and other forms. Actual reporting channels can be found in a dedicated section on the Company's official website: reporting email at jubao@boe.com.cn or reporting hotline at 010-64318888 ext. Audit and Supervision / Discipline Inspection Commission, providing convenient and accessible channels for whistleblowers to report fraud or provide leads;
- Strictly standardizing investigation management processes, imposing strict confidentiality requirements on all personnel involved in investigations, and ensuring the smooth progress of investigation work;
- Implementing classified management of investigation materials, and comprehensively protecting the lawful rights and interests and information security of whistleblowers from both process and institutional levels. The identity of whistleblowers and the content of their reports will be fully protected. Any form of retaliation is strictly prohibited, and violators will be subject to disciplinary action in accordance with the Company's internal regulations.

(10) Special Audits and Investigations

BOE has established a normalized supervision, inspection, and special investigation mechanism.

We adhere to:

- Conducting audit evaluations of the economic responsibility performance of managers at all levels during their tenure in accordance with the Economic Responsibility Audit Management Measures;
- Conducting supervision and evaluation of professional managers' compliance and integrity performance during their tenure in accordance with the Professional Manager Management System;
- Handling various reported leads according to established procedures and establishing special investigation teams to conduct investigations in accordance with the Fraud Investigation Management Measures.

(11) Training and Education

BOE continuously conducts business ethics training covering all employees (including part-time and contractors).

We adhere to:

- New employees receiving integrity and dedication training upon onboarding;
- Organizing key-position personnel to sign the BOE Employee Code of Conduct Declaration;
- Conducting integrity talks with newly appointed managers;
- Directors and management receiving regular integrity training.

VI. Conclusion

Business ethics is not an empty document, but a choice of action made by BOE people every day.

We firmly believe that only by adhering to righteous management can we win lasting trust; only by upholding business ethics can we achieve sustainable development. BOE will, as always, conduct all business activities in an honest, fair, and transparent manner, and create a better future together with customers, partners, employees, and society.