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Code of business ethics

I. Purpose

This Code of Business Conduct is a set of rules that all employees of the factory must adhere to. It also represents the factory's business principles and commitments to all stakeholders, such as employees, customers, suppliers, business partners, shareholders, and the surrounding community.

II. Scope

This Code applies to all employees at all levels and in all departments within the factory. Every employee of the factory, regardless of time or location, must adhere to the highest standards of business ethics when handling issues.

Management Manual

under the guise of legitimate business activities;

(4) Trade Secrets: Within the scope of laws and regulations, the factory's relevant departments shall adopt certain confidentiality management measures to protect commercial information matters such as technical information and operational information that are related to the factory's interests, and shall stipulate that all factory employees shall protect such trade secret information.

V.Communication Methods

(1) All employees or other relevant parties (customers, suppliers, local government authorities, etc.) have the right to contact the factory’s compliance officer to communicate and seek answers regarding any doubts or questions related to business ethics, including but not limited to:

a. Feeling uncertain about issues involving business ethics;

b. Being unsure how to act in certain special circumstances to comply with the factory’s business ethics guidelines;

c. Business partners, customers, or colleagues requesting actions that may violate business ethics guidelines or even be illegal;

d. Observing or suspecting that business 0 0 -1 13.60000038 16.8C9(cubserving)-12or collviolate

c. To encourage employees to actively communicate about business ethics issues and ensure that all employees are aware of the methods and channels for reporting through training;

d. Promptly organize relevant personnel to investigate and handle reported information, and maintain records;

e. If the reporter is also involved in the violation, the reporter will also be subject to corresponding disciplinary action; however, disciplinary action against those who voluntarily report or confess will be mitigated depending on the circumstances.

(3) Communication and Contact Information:

a.Internal communication, complaints, and reports regarding:

Compliance Specialist, General Manager's Office, Heat-Resistant Wire Factory

Email:wujiahe@ztt.cn Phone:18862796052

b. External communication, complaints, and reports regarding :

Audit and Performance Department, Financial Management Center, Zhongtian Technology Group

Email:zttma@ztt.cn Phone:13962714128

Zhongtian Technology Group Procurement Management Center, Procurement Internal Control Department

Email:zttpsaudit@ztt.cn Phone:18751353183 / 13485175356

sake of small groups or personal gains, thereby undermining the factory’s development; Managers and supervisors, as senior-level leaders, must lead by example, support and guide subordinate employees to act in accordance with these guidelines, and ensure proper supervision;

b. Actively learn and fully understand that any violation of commercial ethics requirements may harm the factory's good image and reputation. Consciously uphold and adhere to the highest moral standards, maintain public order and social responsibility, and refrain from engaging in any improper conduct that may cause the factory to violate relevant commercial ethics requirements;

c. All employees should fully understand and comply with the management procedures and policies related to internal business ethics, while adhering to the specific requirements of the factory s relevant management systems, and work together to promote continuous improvement in the factory s business ethics

activities. Any questions or concerns may be directly communicated with the relevant personnel.

(2) Protection and Respect for Employees

Qualitative Commitment:

a. The factory is committed to ensuring the safety of all employees; employees and customers are the factory's most valuable assets. The factory guarantees that all employees have the right to work in a safe environment and is dedicated to preventing any workplace accidents. The factory pledges to comply with safety-related laws, regulations, international standards, and conventions; to continuously improve its internal safety management systems; to help employees understand safety signage; to ensure they are aware of the safety risks associated with their roles and the corresponding preventive measures; and to ensure they perform their duties in accordance with established procedures;

b. The factory is committed to ensuring the occupational health of all employees; it maintains that improvements in productivity and the sustainable development of the business should not come at the expense of employees' well-being, and guarantees

d. All employees who discover any safety hazards or safety management deficiencies, as well as any behavior or activities that violate human rights requirements, may report directly to the relevant personnel.

Quantitative targets:

a. Zero work-related accidents;

b. Zero cases of occupational disease;

c. There were zero incidents of violations of workers' human rights, including discrimination, harassment, abuse, human trafficking, the use of child labor, the exploitation of underage workers, forced labor, violations of the freedom of association and the right to collective bargaining, overtime exceeding legal limits, and

and wastewater are disposed of in compliance with regulations and actively cooperates with inspections by relevant government regulatory authorities; the factory

a. The factory upholds the principle of “quality builds dignity.” Through innovative services and high-quality products, the factory strives to provide customers with the highest value. The factory commits to maintaining the highest standards for product quality and service standards at all times;

b. This factory is committed to complying with quality-related laws, regulations, and international standards or conventions, continuously improving the procedures and systems of its quality management system, and ensuring that records are objective, impartial, and timely;

a. Integrity and honesty are the most fundamental requirements for our cooperation with clients and other stakeholders; they are crucial to the healthy development of the factory. The factory s growth must be based on quality and other performance metrics, and must not rely on unethical practices such as bribery and corruption. The factory strictly prohibits all forms and all instances of embezzlement, corruption, and bribery;

b. The factory is committed to maintaining a business environment characterized by integrity, transparency, fairness, and openness. It strictly prohibits fraudulent conduct in which individuals intentionally use dishonest means—such as deception, fabrication, concealment, or misrepresentation—to obtain improper benefits, thereby causing others to form erroneous perceptions and make unfavorable decisions that result in harm to their property, rights, or legitimate interests.

c. Our factory is committed to strictly complying with all applicable laws, regulations, and international standards and conventions related to anti-bribery, anti-corruption, and anti-fraud, and supports the effective operation of our internal compliance management system and anti-bribery management system;

d. All employees shall refuse to engage in any form of embezzlement, corruption, bribery or fraud, even if the factory benefits from such misconduct, such as bribing customers in exchange for orders or inflating prices, bribing suppliers in exchange for priority shipping or lower prices, or bribing public officials to circumvent scrutiny or obtain policy support.

a. 100% coverage of internal audits for anti-bribery, anti-corruption, and anti-fraud measures across all operational sites;

b. 100% of employees have received ethics training on anti-bribery, anti-corruption, and anti-fraud;

c. Zero incidents of bribery, corruption, or fraud;

4. ISO 37001 100%

d. 100% coverage of anti-bribery management system certification (ISO 37001) across all operational sites.

(6) Adhering to fair competition

Qualitative Commitment:

a. The factory is committed to maintaining a fair and impartial market environment and competitive order, ensuring that it does not use its market dominance to hinder, exclude, manipulate, or influence other competitors in the industry from participating in competitive activities with the factory;

b. The factory pledges to strictly comply with all applicable laws, regulations, and international standards and conventions regarding unfair competition and antitrust;

c. All employees should cultivate a correct understanding of competition and the market, align with the factory's culture and achievements, while refusing to abuse the factory's dominant position in the industry to engage in monopolistic behavior, collude with peers to divide markets, manipulate bids, control prices, or restrict production;

d. All employees must respect competitors' trade secrets, trademarks, and brands, and refrain from improperly obtaining competitors' trade secrets through clients, suppliers, or other means, or from counterfeiting competitors' trademarks and brands to gain a competitive advantage;

e. All employees must immediately report any instances of unfair competition involving the factory to the relevant factory personnel.

Quantitative targets:

a. 100% of employees have received ethics training on anti-bribery, anti-corruption, and anti-fraud;

b. Zero incidents of bribery, corruption, or fraud

c. Zero incidents of unfair competition.

(7) Adhering to compliant operations

Qualitative Commitment:

a. The factory pledges not to engage in, condone, or facilitate any money laundering activities, particularly those involving proceeds of crime; the factory strictly complies with all applicable anti-money laundering laws, regulations, and relevant international standards and conventions, and will not engage in any unethical conduct that could implicate the factory in money laundering;

b. The factory pledges not to engage in, condone, or facilitate any tax evasion activities; the factory strictly complies with all applicable tax laws and regulations, as well as relevant international standards and conventions, and does not engage in any unethical conduct that could implicate the factory in tax avoidance schemes;

c. The factory commits to upholding trade compliance and adhering to the trade compliance and import/export control requirements of all countries involved in its overseas business operations, including product exports and equipment imports. The factory shall proactively identify and understand the relevant laws and policies of the countries involved in its business operations to promote comprehensive trade compliance;

d. The factory maintains neutrality in its overseas operations. In countries where political disputes are particularly severe and religious beliefs and ethnic compositions are complex, the factory strictly adheres to a neutral stance on political and religious matters and resolutely refrains from becoming involved in local disputes; The factory should proactively identify and understand the relevant circumstances of the countries in which it operates. Improper statements or activities that could lead to the factory being mistakenly perceived as holding a particular stance—thereby violating business ethics—must be avoided. It must be made clear that the factory does not represent the company in public or political activities, and it must not use any company resources to support political candidates or parties. Furthermore, the factory must avoid participating in any decision-making processes regarding the factory conducted by public sector entities or other government agencies;

e. All employees who discover deficiencies or errors in the factory's compliance operations must promptly report them to the relevant personnel to ensure timely correction of non-conformity and avoid adverse effects on the factory's overseas operations and business ethics.

Quantitative targets:

1. 0

a. Zero incidents of money laundering;

2. 0

b. Zero incidents of tax evasion or tax avoidance;

3. 100%

c. 100% compliance with laws, regulations, and policies related to foreign trade;

4. 100%

d. 100% coverage of financial audits for all operating locations.

(8) Avoidance of conflicts of interest

Qualitative Commitment:

a. Conflicts of interest may distort employees' sound business judgment, causing them to prioritize their personal interests over those of the company, thereby disrupting normal business operations and harming the company's legitimate interests. The company is committed to fully identifying and avoiding situations involving conflicts of interest;

b. Employees shall avoid any actions that may involve themselves or their relatives and conflict with the interests of the factory and its related parties, including but not limited to:

Without written approval from the head of their department, employees shall not arrange for relatives to work at business-related entities where conflicts of interest may exist, nor shall they accept labor or technical services from such entities;

e. If a conflict of interest is identified or there is a potential risk of such a conflict, it must be promptly reported to the relevant personnel at the factory.

Quantitative targets:

1. 100%

a. 100% internal audit investigation rate for conflicts of interest across all operational sites;

2. 0

b. Zero incidents of major non-compliance resulting from conflicts of interest.

(9) Keeping business secrets confidential

Qualitative Commitment:

a. Trade secrets are an important intangible asset for the factory. The factory strictly complies with laws, regulations, and relevant international standards and conventions regarding trade secrets, continuously refines its internal regulations on trade secret protection, and promotes the operation of its internal trade secret management system;

b. All employees shall not, without prior internal communication or approval from their superiors, release to the public, discuss in public, disclose to unauthorized

persons or institutions, or use the factory's or related third parties' confidential business information and confidential technical information (confidential business information and confidential technical information are collectively referred to as “trade secret information”) without proper authorization;

c. Business information includes but is not limited to: confidential matters in major decisions; business strategies, directions, plans, projects, and decisions that have not yet been implemented; contracts, agreements, memorandums of understanding, feasibility reports, and records of major meetings held internally; supply and marketing intelligence and supplier and customer files; financial budget and final accounts reports, various financial statements, and statistical reports (excluding those required to be publicly disclosed); information that has not yet entered the market or been publicly disclosed; employee personnel files, wages, labor-related income, and related documents; internal management systems;

d. Technical information includes, but is not limited to: various technical materials; technical achievements completed by employees during their employment, as well as papers, works, books, or information summarized or discovered during their employment, and other matters determined by the factory to be confidential;

e. Employees responsible for managing, using, and transmitting confidential business information and confidential technical information shall not improperly disclose or misuse such data within the factory or to external third parties. When it is necessary to disclose confidential factory matters in external communications and cooperation, prior approval from the general manager shall be obtained. When employees discover that confidential business information or confidential technical information has been leaked or may be leaked, they shall immediately take remedial measures and report the matter in a timely manner.

f. All employees are strictly prohibited from using the factory's confidential commercial information for personal gaingaingaiextemeC63Ee.5on andrciangaingahird mproperly

(10) Protection and respect for intellectual property rights

Qualitative Commitment:

a. Intellectual property is the core embodiment of a factory s technological, process, and equipment advantages, and plays a vital role in underpinning its dominant market position and strong competitiveness; the factory places great emphasis on protecting its internal intellectual property achievements, strictly complies with relevant intellectual property laws, regulations, and international standards or conventions, and respects and protects the intellectual property rights of others;

b. All employees should properly store media containing intellectual property (such as technical drawings, databases, software keys, and product prototypes) and refrain from copying, distributing, or removing such sensitive media from the workplace;

overlooked elements, so as not to infringe upon or violate the intellectual property rights of any third party;

d. Intellectual property rights authorized for use by others shall not be disseminated or shared without the permission of the owner. Intellectual property rights shall be protected and the achievements of others shall be respected;

e. All employees who discover any violations of intellectual property rights or have genuine concerns should promptly report them to the relevant personnel at the factory.

Quantitative targets:

1. 0

a. Zero incidents of intellectual property leaks;

2. 0

b. There were zero instances of infringement of intellectual property rights belonging to other relevant parties.

(11) Responsible Information Management

Qualitative Commitment:

a. The continuous and stable operation of information systems and the proper

2. 0

b. There were zero incidents of information leaks.

VII.Document Review and Guidance

a. Zhongtian Technology Heat-Resistant Conductor Factory is responsible for interpreting and revising these guidelines. The factory will review this document annually and update its content as appropriate, taking into account the latest relevant domestic and international laws, regulations, and policies; international standards or conventions; regulatory requirements; and industry trends, as well as feedback from the factory's stakeholders.

b. This document is available in both Chinese and English. In the event of any discrepancy between the Chinese and English versions, the Chinese version shall prevail.

VII.Related documents

Internal and External Complaint and Reporting Communication Procedure ZTTHRC-T02-RLZY-002

VIII.Appendices

Appendix 1: "Record of Violations of the Code of Business Ethics"

Appendix 2: "Commitment to the Code of Business Ethics"

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XX Record of Commercial Ethics Violation Incidents

ZTTHRC-BE04-CB-001

Description

Date	Incident date	People involved	Sex	Department

ZTTHRC-BE04-CB-002