
LUXSHARE ICT

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Dear Colleagues,

At Luxshare Group, our most valuable asset is our reputation. Our reputation is built on the foundations of integrity, excellence, and the trust of our customers, and it is continuously shaped and strengthened by every decision we make and every action we take each day.

The Global Code of Business Conduct and Ethics (“Code”) reflects the shared values of all Luxshare Group employees and represents our solemn commitment to conducting business with integrity. Upholding the highest ethical standards is the fundamental path to achieving sustainable growth and earning the trust of our global customers, suppliers, and partners.

This Code provides clear guidance on the ethical and legal issues you may encounter in your daily work. I encourage everyone to study it carefully, understand it thoroughly, and put it into practice in your day-to-day responsibilities.

Let us work together to ensure that every decision we make and every collaboration we engage in reflects our unwavering commitment to compliance, integrity and excellence.

reflected in every interaction we have with customers, suppliers, business partners, and the communities we serve, and it is the foundation of the trust we earn.

- **[illegible]** We are committed to strictly adhering to all applicable laws and regulations in the countries and regions where we operate, as well as to our own internal policies. Compliance represents the minimum standard for our business conduct and is a boundary that must never be crossed.
- **[illegible]** We respect the value and dignity of every employee and are dedicated to fostering a diverse, inclusive, and equitable work environment.
- **[illegible]** We take responsibility for our actions and their consequences. This sense of responsibility extends to our product quality, commitments to shareholders, environmental protection, and contributions to society.

2 [illegible]

This Code applies to everyone who works for or on behalf of Luxshare Precision Industry Co., Ltd. and its affiliated entities (collectively, the “Luxshare Group” or the “Company”), including, without limitation, the Company’s regular employees, senior management, directors, supervisors, dispatched workers, interns, rehired personnel, outsourced personnel, and consultants, without any exception.

Not only we encourage you to comply with this Code, but also, we expect you not to induce or encourage others to violate it. Likewise, we expect our third-party business partners, such as suppliers, agents and distributors, to adhere the business conduct standards that are consistent with this Code. We only work with partners who share the same integrity value and commitment.

This Code is a principles-based document. For more detailed operational guidance, you should refer to Luxshare Group’s applicable policies and procedural documents. All policies referenced in this Code are available on the Company’s intranet or may be obtained by contacting the Human Resources Center. For general questions regarding this Code, please reach out to the Human Resources Center or the Intellectual Property & Legal Center.

3 [illegible]

Since Luxshare Group operates globally, therefore, the laws and regulations may vary across different territory and jurisdictions. Consequently, when handling specific matters, if the requirements of this Code differ from those of local laws or

regulations, we must always adhere to the stricter standard.

If you are uncertain about which standard applies, you should follow the higher ethical standard and immediately consult with the Inspection and Investigation Division.

4

Luxshare Group's compliance framework operates as a comprehensive system. Building upon this foundation, the Company has also developed a series of specialized policies, such as the Luxshare Group Anti-Bribery Management Manual, the Luxshare Group Personal Information Protection Policy, and the Luxshare Group Export Control, Economic Sanctions, and Supply Chain Compliance Guidelines (General Provisions) (including any subsequent amendments (n646 0.002 Tc -0.00 (a2 8.91 0 d (If)Tj 0.004 Tc 0.328 w 15.59 0 7 (e t)1p10 (aro

subject to external audits and accountability; and be held legally and procedurally accountable for any negligence, dereliction of duty, or acts of covering up or shielding misconduct.

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Employees shall complete the required training on a quarterly basis and submit a written confirmation each quarter, declaring that they have read, understood, and committed to comply with this Code (including any subsequent amendments). In all work activities, employees shall strictly adhere to this Code, applicable laws and regulations, and the Company policies; if uncertain situations arise, employees shall immediately suspend the activity and promptly consult with their direct supervisor. Employees is obligated report any known or reasonably suspected violations truthfully and in timely manner through the designated channels, and actively cooperate in any investigations.

When engaging with the Company's customers, suppliers, and other business partners, as the Company' representation, you must always adhere to the highest standards of integrity, honesty, and fair dealing.

3

The Company strictly prohibits any form of kickbacks, bribery, unearned compensation, or other improper payments and benefits. Conducting business with all business partners honestly is the foundation in maintaining healthy and lasting business relations. Any employee who encounters a third party offering such improper benefits or inducements must immediately report the matter to their direct supervisor and the Inspection and Investigation Division.

3 .1

Luxshare Group's reputation and brand are built on the innovation and quality of its products and services. Luxshare Group consistently pursues the highest standards of product quality and performance to earn customers' trust in the reliability, high quality, and excellence of its products. Our success depends on customer satisfaction, trust, and goodwill. Therefore, we are committed to respond and address the customer opinions, inquiries, and feedback in a prompt, courteous, and fair manner.

2

In procurement operations, Luxshare Group is committed to ensuring the continuity

state-controlled, or perform public functions (e.g., state-owned enterprises, public institutions, public hospitals/schools, research institutes, etc.);

- Officials or employees of public international organizations;
- Individuals delegated by government authorities, state-owned enterprises, or public institutions to non-state entities who exercise management, supervision, or other powers representing public authority or public interest; and
- Foreign political parties, their officials, candidates for foreign public office, and the agents, advisors, or representatives of the aforementioned individuals.

Even if such entities operate within the commercial sector, their personnel could still be considered as “Government/Public Officials” if such entity is state-owned, state-controlled, or performs public functions.

2 “Thing of Value” broadly refers to any tangible or intangible benefit, including but not limited to: gifts, meals, entertainment, cash or cash equivalents, securities, discounts, commissions, sponsorships, donations, internship or employment opportunities, etc.

- The Company strictly prohibits providing any “Thing of Value” to any Government/Public Official through [illegible]

Government/Public Officials or private enterprises and are capable of influencing their decision-making. This includes, but is not limited to: employees, classmates, colleagues, and others.

2 All business-related expenses and transactions must be accurately, truthfully, and completely reflected in the Company's books and records. It is strictly prohibited to establish off-the-books accounts, fabricate transactions, or alter the purpose of vouchers to conceal any improper payments.

2 Every employee is responsible for understanding and complying with the content of this chapter. In any uncertain situation, employees should suspend the relevant action and immediately consult with their direct supervisor or the Inspection and Investigation Division. Any violation of the provisions of this chapter will result in strict disciplinary action, including but not limited to termination of employment; in cases involving suspected criminal conduct, the Company will refer the matter to the judicial authorities for handling.

For more detailed provisions, please refer to the Anti-Bribery Management Manual, and always comply with the stricter requirements set forth therein.

3

Normal business courtesies, such as modest gifts and hospitality, are common ways to establish and maintain a professional business relation. However, we must ensure that these activities are solely intended to promote professional cooperation, and are not used to obtain or reciprocate improper commercial advantages.

3

No gift or hospitality shall be used to influence the business decisions of the recipient, or to create the impression that it is intended to affect the recipient' objective judgment. Any gift or hospitality that could potentially damage the Company's reputation is strictly prohibited. The rules in this section are designed to protect both your and the Company's reputation and to prevent allegations of bribery or undue influence; you are responsible for verifying in advance whether your actions comply with this Code.

3

For commercial interactions between private enterprises, gifts and hospitality are

suppression, or bid rotation);

- Exchanging competitively sensitive information, such as capacity, output, costs, profits, credit terms, inventory levels, capacity plans, product roadmaps, marketing or sales plans, customer lists, or R&D and product-launch timelines;
- Coordinating to restrict the development of new technologies or the launch of new products, or initiating or participating in joint boycotts of third parties.

The term “Competitor” is broadly defined. In addition to traditional industry peers, it also includes any customers or suppliers that currently or potentially offer the same or substitutable products or services in the relevant market. When communicating with such parties, discussions must remain strictly limited to lawful, publicly, and industry-appropriate topics. If the conversation touches upon—or approaches—any of the sensitive areas described above, you must clearly state that such discussions are prohibited under Company policy, and immediately conclude the conversation or leave the meeting. Afterward, you must promptly report the incident to the Office of the Board Secretary, and, where appropriate, notify the Intellectual Property and Legal Center as well. All relevant details—including the time, location, participants, and key points of the conversation—must be documented accurately.

In certain limited circumstances, legitimate cooperation arrangements with competitors—such as joint ventures or franchise agreements—may constitute exceptions to the above restrictions. However, such arrangements must be reviewed and approved in advance by the Intellectual Property and Legal Cocumepiewed sents m

analytical products purchased through lawful and compliant commercial channels from reputable third-party research institutions or data service providers.

- Internal Proprietary Data: Data lawfully accumulated during the course of the Company's own business operations. The use of such data must not violate any confidentiality agreements or legal obligations that the Company has entered into with third parties (such as customers or suppliers).

Under no circumstances may information be obtained through any of the following illegal or unethical means:

- Fraud and Misrepresentation: Misleading others to obtain non-public information by using false identities, making false statements, or employing any other deceptive methods.
- Technical Intrusion: Atte[illegible]

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conducted lawfully and in full compliance with applicable regulations. When handling import and export matters, you must ensure that all information submitted to

content of this chapter is intended to provide only general principles. Therefore, employees who involved in the procurement, logistics, sales, finance, R&D, or any related functions not only has the obligation to master and comply with the applicable export control laws and regulations, but also comply with Luxshare Group export policy including but not limited to Luxshare Group Export Control, Sanctions, and Supply Chain Compliance Guidelines (General Provisions) and Luxshare Group Export Control, Sanctions, and Supply Chain Compliance

disciplinary action by the Company.

2

The Company places great importance on and is committed to protecting its technological innovations and creative achievements in areas such as products and manufacturing processes. It has established a comprehensive intellectual property (IP) protection system, covering patents, copyrights, trademarks, trade secrets, and other forms of IP.

Company respects and strictly complies with all applicable intellectual property laws and re6 (awe6 (i)6r)17 (n12.1 (Td [(11.1 (o)10 (m)10 (bo0 (n bye(i)6 (eaf)2 (oe)10 (d s)4 (t

business strategies, you must implement prudent security measures, including encryption and access controls. You must also properly manage account permissions, comply with document management rules, and report any potential security incidents immediately to the Intelligent Information Development Platform and the Compliance Management Department.

For any personal information or critical data transferred across borders or regions, you must strictly comply with relevant legal requirements for cross-border data transfer assessment or filing. No transfer may occur without prior assessment and approval.

For more detailed guidance, please refer to the Company's Personal Information Protection Policy.

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The Company encourages and supports employees in leveraging artificial intelligence (AI) to enhance work efficiency and innovation. To ensure security and compliance, all employees must prioritize the protection of the Company's information assets. It is strictly prohibited to input any Company confidential information (such as source code, financial data, strategic plans, etc.) or personal data (such as employee information, customer information, etc.) into external AI tools.

Employees bear ultimate responsibility for reviewing and modifying AI-generated content, which should be treated as a "preliminary draft" rather than a final product. Before formal adoption or external release, employees must fulfill the following three core review obligations: First, verify facts to guard against AI generating "hallucinated" information due to its technical limitations, which could lead to erroneous business decisions; Second, ensure originality by applying substantive intellectual effort to modify AI-generated content, avoiding direct use that may infringe third-party intellectual property rights. Third, eliminate bias, particularly in high-risk scenarios like human resources, by vigilantly identifying and removing any content that could lead to discriminatory outcomes, thereby mitigating legal litigation risks.

The following actions constitute absolute red lines and are strictly prohibited under any circumstances:

- Employees must not use AI for any illegal or improper activities;
- Employees must not circumvent the Company's security measures, access controls, or technical restrictions;

- Employees must not process others' personal information or biometric data without explicit consent;
- Employees must not create or distribute false information, deepfakes, or other misleading content;
- Employees must not infringe on the intellectual property rights of others or the Company's or customers' trade secrets;
- Employees must not publish AI outputs externally as-is, nor treat them as final, authoritative conclusions;
- Employees must not store or process Company data in personal accounts, unapproved devices, or personal cloud spaces; all Company data must be used only within Company approved, controlled environments.

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Only formally authorized spokespersons or personnel designated by the Company Secretary's Office are permitted to represent the Company in releasing information to external parties or attending any interview or press release that include but not limited to the media (mainstream or social media), industry associations, investors, analysts, etc. If you rece5oMC /P <2 Tw8e 8(h)10 u inedia/. -0. Tw.(u r)7qu4 (ont)2 (ex)4 (t)3 To

environment. The Company pledges to prohibit forced labor and child labor, to never tolerate any form of inhumane treatment, to provide equal opportunities, and to strictly forbid any discrimination or harassment based on race, color, religion, gender, age, nationality, ancestry, citizenship, physical or mental disability, medical condition, sexual orientation, gender identity, veteran status, marital status, or any other legally protected characteristic. The Company also ensures that employees enjoy the rights to freedom of association and collective bargaining in accordance with applicable laws. Anyone who becomes aware of or witnesses human rights violations must immediately report them to their direct supervisor or the Human Resources Center.

2

The health and safety of employees are the Company's top priorities. The Company's goal is to achieve a "zero-accident" workplace. Every employee must strictly adhere to safety operating procedures and has the right to stop work if unsafe conditions are observed. Any safety hazards, near misses, or workplace injuries must be reported immediately.

To maintain a safe, respectful, and efficient working environment, applicable to Company premises, client sites, and all work-related activities, the Company enforces a zero-tolerance policy for workplace violence, threats, intimidation, possession of weapons, or being under the influence of alcohol or prohibited drugs during work. All employees are responsible for promptly reporting any safety risks, and in emergency situations, prioritize contacting law enforcement or security personnel. Any violation will result in severe disciplinary action, including dismissal; suspected illegal activities will be referred to judicial authorities. The Company reserves the right to conduct safety inspections in accordance with applicable laws and regulations.

3

The Company is committed to being a partner in environmental sustainability. While complying with all environmental laws and regulations in the jurisdictions where it operates, the Company actively follows international best practices and strives to meet higher environmental standards set by its customers. To achieve this, the Company establishes comprehensive environmental objectives and continuously works to minimize the negative impact of its products and operations on the environment. Effective measures are implemented to limit waste generation, promote resource recycling, and advance energy conservation, ensuring that every business activity aligns with the Company's commitment to sustainable

development.

The Company is committed to continuously striving to be a contributing member of the global community. Af5 0 snductte snducitizens in the locations where we opee, we have the ponsibility to support community development and to paisnducipate in public welfare initiatives that enhance the well-being of local communities.

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prior approval from the Compliance Committee.

Example: Your spouse is a major shareholder of a supplier that is currently participating in a procurement bidding process of your department.

2) You or your Close Relatives are prohibited from accepting personal loans, commissions, payments or any other form of benefits from any entity that has, or seeks to have, business dealings with the Company.

B

1) Without approval from the vice president of the Human Resources Center, you are prohibited from hiring or appointing your Close Relatives within the same department, or assigning them to positions involving direct reporting relationships, financial dependency, or influence over you. If such a relationship develops between two employees, the employee in the higher position must immediately report it to his direct supervisor. The Company may resolve the conflict by reassignment or, when necessary, termination of employment. If there is uncertainty regarding whether a position falls under this rule, the Human Resources Center shall make the final decision in accordance with Company policy.

Example: You are the hiring manager for position, and your brother applies for that position.

2) You must recuse yourself from representing the Company in business dealings with any enterprise in which your Close Relatives hold key positions. Upon identifying any potential related-party transaction, you must immediately disclose it in full to your department's vice president and the Inspection and Investigation Division. Related-party transactions involving senior management or Board members must undergo review strictly in accordance with the Company's related-party transaction policies and procedures, and appropriate measures shall be taken (including but not limited to information barriers, abstention from voting, independent evaluation, etc.). The Company will disclose related-party transactions to the extent required under applicable accounting standards, laws, regulations, and securities market rules.

Example: Your son is the sales director of one of our key suppliers.

C

1) [illegible] You shall not work for the Company's suppliers, customers, or competitors. Additionally, you shall not engage in any work or provide services to any third party that may adversely affect your job performance or judgment. Furthermore, you shall not engage in any external business activities or inventions that are similar to your primary job responsibilities or that constitute (or could potentially constitute) competition with the Company. Prior to accepting any external employment, you must notify the Intellectual Property and Legal Center as well as the Human Resources Center, and obtain written approval. Such external work must not impair your performance at the Company and must not involve the use of Company time, facilities, or resources.

Example: You provide paid consulting services to the Company' competitors or suppliers outside of your working hour.

2) [illegible] Holding director, supervisor, or similar positions in external companies is subject to strict approval procedures. You may not serve as a director or hold similar roles in a competitor without the prior consent of the Company's Board. To serve as a director in a supplier, customer, or other business partner, prior approval from the Chairman of the Company is required. Senior management must also obtain approval from the Board before accepting any new directorship. Any compensation, remuneration, or benefit received for serving as an approved external director must align with the responsibilities undertaken in such role and must be truthfully disclosed in the conflict-of-interest declaration.

3) [illegible]
Participation in industry associations or standards development may create non-financial conflicts of interest and intellectual property risks. Therefore, you must not apply for membership or participate in such activities without prior written approval from the vice president of your department. Any association you intend to participate in must have an established charter and operate in compliance with applicable antitrust laws, which will serve as a key factor in the approval process.

D [illegible]

1) [illegible] You are obligated to always act in the best interests of the Company. It is strictly prohibited to use your position,

internal information, or Company resources for personal gain or to benefit a third party, or to misappropriate any business opportunities that rightfully belong to the Company. Employees may only consider pursuing such opportunities if the Company has explicitly declined them. Senior management must fully disclose such matters to the Board and obtain written confirmation before proceeding; other employees must obtain written confirmation from the Compliance Committee, after which the Chair of the Compliance Committee shall report the relevant matter to the Board.

Example: You learn from an internal meeting that the Company plans to purchase a parcel of land, and you acquire it first with the intention of reselling it to the Company at a higher price.

2) You are prohibited from using Company equipment, information, systems, or positional influence to handle personal affairs or to pursue personal gain.

E

Before engaging consultants, agents, or any other third parties, due diligence must be conducted to ensure that they are qualified, reputable, and free from conflicts of interest. All engagement agreements must be documented in writing and approved at the appropriate level.

7

Once you become aware of any actual, potential, or perceived conflict of interest, you must promptly report it in writing through the designated channels to your vice president and the Human Resources Center. All completed disclosure and approval documents will be centrally filed and retained by the Human Resources Center. Timely and comprehensive disclosure is a fundamental requirement of the employee's duty of loyalty. Upon receiving your disclosure, the Human Resources Center will work with you and your direct supervisor to objectively assess the situation, determine whether a conflict of interest exists, and evaluate the potential impact on the Company's business.

If a conflict of interest is confirmed, the Company will take necessary risk-mitigation measures based on the specific circumstances, which may include, but are not limited to, recusal from decision-making, information isolation, duty adjustment, divestment of financial interests, or termination of external relationships.

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In the course of your work, you may have access to material non-public information regarding the Company or our business partners (for example, upcoming financial reports, major merger or acquisition plans, or the signing of significant contracts). Consultants and other individuals engaged to provide services to the Company may also come into contact with such information. Before this information is publicly disclosed, using it to buy or sell stocks or other securities for yourself or others, or “tipping” such information to anyone else, constitutes illegal insider

referred to relevant authorities in accordance with the law.

7.4

All Company assets, including equipment, systems, funds, intellectual property, and other resources, may only be used for legitimate and lawful business purposes.

Employees should use and protect Company assets prudently and economically, and ensure that all business expenses are compliant with internal policies, with reimbursement documents being true and accurate. Any employee who discovers potential loss, misuse, or theft of assets must report it immediately.

The Company provided equipment, networks, systems, and accounts (including but not limited to email, voicemail, and internet access) are Company property and intended solely for lawful and compliant business use. Employees fully acknowledge that should be no personal privacy in using such provided assets. The Company reserves the rights to conduct all required monitoring, review, or access in accordance with this Code along with the applicable laws and regulations. For the purposes of system maintenance, preventing or investigating misuse, ensuring software compliance, responding to legal or regulatory requests, or ensuring business continuity during employee absence, the Company may access the content of Company-provided devices, systems, or accounts without prior notice. Employees must properly safeguard all equipment, refrain from installing unauthorized software, and return all Company assets, along with any data stored on those assets, upon resignation or a change of position.

8

The Company encourages employees to speak up and promptly report any suspected or actual violations of this Code. Multiple safe and confidential reporting channels are available, including:

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Reports may be made on a named or anonymous basis. All channels support