

## Xiamen ITG Holding Group Co., Ltd.

### Code of Business Conduct

Xiamen ITG Holding Group Co., Ltd. abides by the principle of integrity in business operations, conducts cooperation with all stakeholders in accordance with the highest requirements of business ethics and corporate governance standards, and establishes a good corporate reputation.

In order to ensure a level playing field and foster a culture of integrity and honesty in all business operations, the company and its affiliated investment enterprises must comply with the following codes of business conduct on the premise of abidance by all applicable laws and regulations; moreover, the company encourages its partners, including suppliers and contractors, to join in the effort to establish a standardized, harmonious, honest and transparent business environment by adhering to those codes of conduct:

#### I . Antitrust and Fair Competition

The company is committed to upholding relevant international conventions and complying with all applicable laws and regulations in China and the country (region) where it operates to prevent monopoly and

unfair competition. The company believes in maintaining fair competition in the market.

## II. Anti-corruption and Anti-commercial Bribery

The company is committed to maintaining a culture of integrity, with a "zero tolerance" policy towards fraudulent practices, and corruption and commercial bribery.

(1) The company strictly abides by the laws and regulations on anti-corruption and anti-commercial bribery in China and the countries (regions) where the business operates, the regulations and guidelines on anti-corruption and anti-commercial bribery in multilateral international financial institutions, and its relevant rules and regulations within the company.

(2) The company prohibits any form of bribery, including but not limited to offering any improper rebates and other forms of bribery to other enterprises or individuals; The company also prohibits soliciting benefits from customers, suppliers or other stakeholders, and will not offer or accept remuneration or other benefits that may unfairly affect the company's business.

(3) Establishing Oversight Mechanisms. The company is dedicated to promoting accountability and transparency through various oversight mechanisms, including inner-Party supervision, discipline inspection and supervision, coordination mechanisms, and grassroots supervision.

These measures work together to create a joint force of supervision, ensuring that the company operates with integrity and in compliance with all applicable laws and regulations.

(4) **Incorruptible Cultural Development.** The company recognizes the importance of establishing an incorruptible culture and is committed to promoting the "1 + X" supervision mechanism. The company conducts regular special rectification activities to root out corruption and promote an ethical work environment. By continuing to build an incorruptible culture brand and creating a clean atmosphere through culture construction, the company strives for sustainable and incorruptible cultural development.

### III. Conflict of Interest

The company is committed to preventing the negative impact of conflicts of interest on businesses and individuals involved. All employees are responsible for reporting any actual and potential conflicts of interest, following the prescribed procedures, and taking the necessary initiative to apply for any conflicting situations.

### IV. Fair and Honest Transactions

The company is committed to conducting transactions with partners including suppliers and contractors in a fair and integrity manner. To ensure fair transactions, the following basic principles must be observed when purchasing products and services:

- (1) Do not misappropriate the bid deposit.
- (2) Do not impose unreasonable conditions that restrict or exclude potential bidders;
- (3) Do not rig, collude or defraud in the bid process;
- (4) Do not lend or lease relevant qualifications, certificates, licenses and so forth for others to bid;
- (5) Do not engage in bribery or accept bribes during the bidding process;
- (6) Do not collude with suppliers to harm the interests of enterprises;
- (7) Do not raise or lower procurement standards without authorization;
- (8) Do not include discriminatory or tendentious clauses in the bidding procurement.

#### V. Respecting Intellectual Property Rights

The company respects the intellectual property rights of others while also protecting its own. The company promises not to engage in any commercial activities that infringe on the intellectual property rights of others.

#### VI. Tax Compliance

The company strictly abides by the tax laws and regulations of China and the country (region) where the business operates, and fulfills its tax obligations according to law.

#### VII. Whistle-blowing and Whistleblower System

Any stakeholder is encouraged to report any violation of the

company's Code of Business Conduct. The company holds a zero-tolerance policy toward any violation of laws and regulations, and will severely punish the behavior once verified. The company will also strictly implement the whistleblower protection system, and protect the legitimate rights and interests of whistleblowers, the contents and information of whistleblowers are strictly kept confidential, and tippees and retaliators are in accordance with the law.

Whistleblowing Method:

Report Telephone: 0592-5830972

Email: Discipline Inspection Committee of ITG Holding (Ombudsman's Office), Floor 29-30, ITG Center, No.4688 Xianyue Road, Huli District, Xiamen, Postcode: 361016

#### VIII. Validity and Interpretation

- (1) The policy takes effect from the date of issue.
- (2) Discipline Inspection Committee (Ombudsman Office) is responsible for the interpretation of the anti-corruption, anti-commercial bribery and whistleblower system of the policy, and the Legal Risk Control Department is responsible for the rest of the clauses.

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