



## **Tongwei Co., Ltd.**

# **Anti-Corruption and Anti-Bribery Policy**

### **1. Policy Statement**

Tongwei Co., Ltd. (hereinafter referred to as “Tongwei” or the “Company”) is committed to upholding both commercial value and social responsibility, and is dedicated to conducting business with higher ethical standards. With the operating principle of “Honesty, Trust, Fairness, and Excellence”, Tongwei is committed to strictly complying with the anti-corruption and anti-bribery laws and regulations in China and in the countries where all business partners and stakeholders are located. The highest decision-making authority for the company's anti-corruption and anti-bribery initiatives resides with the Board of Directors, which holds ultimate decision-making power and supervisory responsibility over these matters.

### **2. Scope of Application**

This policy applies to all Board members, management and employees of the Company and all its branches and subsidiaries. The term "employees" refers to full-time employees who have signed formal labor and service contracts with the Company, as well as interns. Suppliers, contractors, partners and other relevant stakeholders who do business with the Company are encouraged to actively comply with this policy.

### **3. The Acts of Corruption and Bribery under This Policy Mean:**

- 1) Actions of unfair competition in the form of directly or indirectly offering or receiving cash, material items and other benefits outside the transaction under various guises such as kickbacks, promotional fees, publicity fees, labor fees, reimbursement of various expenses, and the provision of domestic and overseas travel, with the purpose of obtaining business transaction opportunities.
- 2) Exploiting one's position to embezzle, steal, defraud, or illegally possess the Company's property by other means, as well as misappropriating the Company's funds for personal use or lending them to others.

#### **4. Anti-corruption and Anti-bribery Legislation**

- 1) Corruption and bribery are prohibited in all production and management activities of Tongwei.
- 2) In accordance with applicable anti-bribery regulations, both the Company and its employees will face criminal liability if any employee or related party directly or indirectly offers, pays, receives, or solicits any valuable item in exchange for improper benefits or influence in the performance of duties or activities.
- 3) All anti-bribery regulations, including but not limited to the Prevention of Bribery Ordinance, the Criminal Law of the People's Republic of China, the Anti-Unfair Competition Law of the People's Republic of China, and the relevant regulations of the countries in which the respective business dealings take place may be applicable to any corruption or bribery that occurs, and therefore all of the Company's employees are required to comply with this policy.

#### **5. Anti-bribery Policy**

In the process of operations, Tongwei consistently insists on the business commitment of integrity and responsibility, pursues the principle of integrity, and strictly abides by laws and regulations, to promote the sustainable development of

the Company. According to the Company's policy, all employees are prohibited from engaging in any form of corruption or bribery, and the following regulations are established:

- 1) Employees are prohibited from seeking cash or cash equivalents, gifts, business banquets and entertainment, positions, contracts, services or other benefits offered by any person for themselves or others in the execution of the Company's affairs in a manner that that would affect fair trade and damage the Company's interests and reputation.
- 2) Employees shall not provide benefits, directly or indirectly, to any person or company with whom the Company has business dealings for the purpose of obtaining or retaining business, seeking trading opportunities or competitive advantages, or obtaining improper benefits, and shall not intend to influence the Company's decision-making with the relevant partners through relevant actions.
- 3) It is prohibited to take advantage of duty to misappropriate the Company's assets or divert the Company's funds for personal use or to lend them to others.
- 4) It is prohibited to obtain transactions, opportunities for services, preferential terms or other financial benefits through the provision of material goods in the name of charitable donations and sponsorships.
- 5) It is prohibited to provide economic benefits — such as funds, supplies, services, equity interests, or debt forgiveness — directly or indirectly under the guise of political contributions.
- 6) Other behaviors violating laws and regulations as well as the Company's rules and regulations, or potentially affecting integrity and fair competition are prohibited.

## **6. Suppliers and Partners**

- 1) The Company establishes cooperative relationships with partners and suppliers on the basis of lawfulness, integrity and fair trade, and expects suppliers and partners to comply with relevant anti-corruption and anti-bribery laws and regulations in their business relationships with their employees, local communities and the Company. Furthermore, the Company requires suppliers to sign the "Supplier Compliance Commitment Letter", hoping to conduct business activities and transactions with them in good faith and legally, and actively comply with the relevant laws and regulations as well as the requirements in this policy, so as to jointly build a clean and honest cooperation environment.
- 2) All employees of the Company have signed the "Clean Performance Commitment". The Company undertakes to take all reasonable steps to ensure that all the partners have been informed of the anti-corruption and anti-bribery principles of this policy and are encouraged to apply these principles to their business practices.

## **7. Anti-corruption and Anti-bribery Training**

All employees of the Company (including but not limited to directors, senior management, general staff, contract staff, part-time staff, and temporary agency employees and interns working for the Company, etc.) have signed the Letter of Commitment on Anti-commercial Bribery (including business ethics and anti-corruption and anti-bribery contents), and participate in the training related to business ethics and anti-corruption and anti-bribery on an annual basis to demonstrate their compliance with the anti-corruption and anti-bribery policies and procedures set out in this Policy. Meanwhile, all suppliers and partners doing business with the Company have signed the Letter of Commitment on Anti-commercial Bribery and Compliance (including but not limited to the contents of Business Ethics and Anti-Corruption and Anti-Bribery), and are required to attend

the annual business ethics and anti-corruption and anti-bribery training organized by the Company to demonstrate their understanding of and compliance with the Company's business ethics and anti-corruption and anti-bribery management policies.

## **8. Complaints and Reports**

Tongwei encourages all employees to report any actual or suspected misconduct related to the Company (including any possible violation of this policy) through the relevant channels. The Company encourages anonymous reporting, and all reports of misconduct will be investigated by the reporting department and serious action will be taken when necessary.

### **1) Whistleblower Protection Policy**

Tongwei commits to strictly protecting the relevant information of each whistleblower in accordance with the law. Without the reporter's consent, their identity will not be disclosed unless required by applicable laws and regulations or a relevant court issues a command or order. The Company and its employees may not discriminate against, retaliate against or victimize whistleblowers. Harassment, discrimination, retaliation and victimization of whistleblowers by any person will be considered serious misconduct and the Company reserves the right to take appropriate actions. If reporters believe that they have been subjected to retaliation, they may immediately report the behavior and provide evidence.

Reporters should be objective and truthful when reporting matters and be responsible for the authenticity of the information provided. They are not allowed to fabricate or distort the facts, and must not jeopardize the interests of the company and the legitimate rights of other employees. For those who maliciously make false reports, the Company reserves the right to take

appropriate action against them and related individuals. For internal employees, disciplinary action will be taken in accordance with company regulations.

## 2) Complaint and Reporting Channels

- Reporting telephone: 028-86188834/028-86188838
- Tel: 15608175053 (the same for WeChat ID)
- Reporting E-mail: [jcb@tongwei.com](mailto:jcb@tongwei.com)
- WeChat public platform: “Lianjie Tongwei”
- Mailing address: Tongwei International Center, No.588, Middle Section of Tianfu Avenue, High-tech Zone, Chengdu, Sichuan Province (Postcode :610041)

## 9. Consequences and Disciplinary Actions for Violations

Any employees of the Company fail to comply with this policy will be subject to disciplinary action, up to and including dismissal or termination of employment (depending on the circumstances), as well as potential civil or criminal charges. Actual or suspected violations of anti-corruption and anti-bribery regulations or other applicable laws will be reported to the local public security authorities or relevant judicial departments as appropriate.

## 10. Record Keeping and Internal Audits

All employees of the Company are required to maintain all records evidencing relevant financial transactions in accordance with financial and internal control guidelines, requirements and generally accepted practices. All business-related

expense reimbursements should be submitted in accordance with the Company's relevant system documents, and the reasons for the expenditures shall be clearly documented. The Supervisory and Audit Department of Tongwei is responsible for monitoring the implementation of this policy to ensure its fulfillment. Employees shall consciously accept and actively cooperate with audits and investigations.

Tongwei Co., Ltd.

Date: December 2025

Remarks:

1. The Company encourages and supports suppliers and partners to adopt and implement additional principles and policies, provided that they do not conflict with this policy.
2. The Company's business operations strictly comply with the local laws and regulations. In the absence of specific local legal requirements, this policy shall be followed.
3. This document is interpreted and revised by Tongwei Co, Ltd. The company will update the document in a timely manner based on domestic and international policies, regulatory requirements, and industry developments. In the event of any inconsistencies between the Chinese and English versions of this document, the Chinese version shall prevail.