

## Code of Conduct

At CIeNET we are dedicated to working with our employees, partners, vendors and customers to deliver high quality services and products in the most effective way. We commit to conducting all of CIeNET's affairs and activities with the highest standards of ethical conduct. Our CIeNET Code of Conduct provides guidance for decisions and actions during our daily work.

We commit to the responsible use of CIeNET assets, to provide the highest quality services to customers, to respect the confidentiality of customers' Intellectual Property Rights and other information, to comply with all rules and regulations and to proactively promote ethical behavior. We ensure the safety of business and customer property, using private or public security teams for increased security.

CIeNET's Code of Conduct is built on CIeNET values. Therefore, we acknowledge our individual responsibility to ensure our collective success by practicing and promoting the following values.

CIeNET supports the United Nations Global Compact initiative. In order to make this commitment clear to employees, suppliers, customers and other stakeholders, the following Code of Conduct is based on the Global Compact's ten principles and is publicly available.

## Code of Business Conduct

We manage our business in compliance with laws and regulatory requirements. We are aware of and obey the laws and regulations that govern the management of our business. We comply with competition laws and regulations. We also operate in strict compliance with the principle of fair competition.

CIeNET commits to never, under any circumstances, develop and sell products which will directly compete with our outsourcing service customers. CIeNET commits to never, under any circumstances, engage in competitive behavior during service and within the agreed years after termination. We respect and protect customers' Intellectual Property Rights (IPR) .

We commit to deliver high quality services to our customers to meet their expectations. CIeNET acknowledges and respects the diverse cultures, customs and business practices it encounters in the marketplace. CIeNET respects the environment and protects our natural resources. We continually seek new ways to improve our services.

## **Code of Ethical Conduct**

### **Employee health and safety**

We must be familiar with and comply with the Group's health and safety rules. The same applies to those of our customer's production site when we are on mission. CIeNET is committed to protecting the environment, health and safety of our employees, our customers, and the communities in which we operate. To well implement company value, CIeNET established the EHS-MS to better implement the concept of environmental protection, green management, and green office, effectively ensure the safety of employees, and respect and protect the legitimate rights and interests of employees.

### **Diversity, inclusion and non-discrimination**

We offer equal employment and career opportunities to all, regardless of age, gender, religion, nationality, marital status, health, disability or any other factor. We treat everyone with respect and never behave in a discriminatory or offensive manner. We value each individual's experience and give everyone the same opportunities for development. We assess each individual on the basis of their respective skills and professional achievements.

### **Preventing harassment**

We do not tolerate any form of harassment or intimidation, whether sexual, physical or psychological. Inappropriate gestures and abusive, racist, discriminatory, sexist or sexual comments or conduct are strictly prohibited. CIeNET has established a mechanism to prevent harassment in the workplace and create an equal, civilized and safe working environment. Clarify the procedures for accepting complaints of harassment, provide timely assistance to victims, and do a good job of confidentiality for whistleblowers to avoid retaliation.

### **Protection of intellectual property and know-how**

We strictly respect the intellectual property rights (patents, trade secrets, brands, etc.) and know-how of our customers, partners and, more generally, third parties. We endeavor to always protect the Group's intangible assets (patents, know-how, brands, etc.). Only use works for which have the necessary authorizations and in strict compliance with the latter. Use the Group's assets only for business purposes and after obtaining the necessary internal authorizations.

### **Compliance with data and information protection and security rules**

We comply with all the rules governing the protection and security of data and information, both internally and for our customers and partners. All employees are required to complete a mandatory training course on information protection and security within the Group. Ensure that no data/information is collected, copied or transferred from

any medium (USB flash drive, external hard drive, email, etc.) that is accessible in the course of work. Be able to strictly comply with internal requirements for the confidentiality level corresponding to the data classification.

## **Data privacy**

We respect privacy and protect personal data. We comply strictly with all applicable local laws and regulations. Collect and process personal data only after obtaining the necessary internal authorization. We are aware of and comply with all data protection and security-related policies within the Group. Strict confidentiality of personal data is required. All employees are required to complete the Group's mandatory training activities on data privacy.

## **Financial and non-financial communication**

We apply the utmost rigour to our accounts and ensure that we communicate in good faith accurate financial and non-financial information. We are aware of and respect the Group's normal and local laws and regulations. Do not disclose any financial information without prior permission. We check the accuracy of accounting, financial and non-financial information provided in official documents within the Group.

## **Stock market regulations**

We comply with stock market regulations, in particular with regard to insider information and insider trading. Maintain the confidential of sensitive or privileged information. Ensure that we are not in possession of sensitive or privileged information before carrying out a transaction in securities. Understand and comply with all internal rules relating to stock market regulations.

## **Conflicts of interest**

We must act objectively in the performance of our duties and avoid any situation in which our personal interests are likely to conflict with those of the Group. Where there is a potential conflict of interest, the line manager will be notified as soon as possible and it will be up to him or her to decide what preventive action should be taken.

## **Fighting corruption**

We apply a 'zero tolerance' policy towards all forms of corruption and influence peddling. CI@NET complies with the anti-corruption laws of the countries in which it conducts business, and act in accordance with the national and international standards applicable to us. We only deal with counterparties who respect our rules of integrity, our values and our principles of action. Ensure that the Group's anti-corruption code of conduct is understood and respected. All employees will be required to complete the group's anti-corruption related training courses. Ensure that necessary checks are carried out before entering into any business relationship.

## **Gifts and hospitality**

We are extremely vigilant about our business relationships. We refrain from attempting to influence business decisions by means of gifts, invitations or advantages of any kind. Ensure that the Group's gift and hospitality policies are understood and respected. All employees will be required to complete the group's anti-corruption related training courses. Make sure you understand both parties' policies before accepting any gifts or invitations. And declare gifts or invitations received in accordance with the Group's rules.

## **International sanctions and embargoes**

We conduct our business activities in strict compliance with national and international economic and financial sanctions regimes. We also comply with embargoes. We comply with local and relevant international laws and regulations. Be vigilant and check as necessary before entering into any business relationship. The Group's Export Control Manager should be consulted prior to any export transaction.

## **Export controls and national security**

We comply with all export control and national security laws and regulations that apply to our activities. In accordance with local and international laws and regulations. Identify activities that are subject to these provisions. We will make necessary checks before the event. Group Export Control Manager will be consulted. We ensure that we are authorized to use or access controlled technologies, assets, and data, and that we obtain the required permissions before commencing activities. We make sure that the necessary authorizations, clearances for operations that affect national security are in place before we start work.

## **Charities, donations, sponsorship**

We are committed to having a positive impact on civil society through our corporate sponsorship activities and local initiatives (particularly in the social, environmental and health fields). We carry out these actions in compliance with local laws and regulations. We ensure that necessary checks are carried out before any charitable activities are carried out. Prior to any sponsorship or voluntary service, the Group's authorization for charitable activities should be followed. And ensure that there is no private interest in the activities.

## **Lobbying**

We undertake to conduct all lobbying activities in accordance with applicable local laws and regulations. For any lobbying activities that you may wish to undertake, ensure that you have obtained approval from the group General Manager. Ability to strictly comply with relevant regulatory obligations (especially reporting obligations).

## **Human rights**

We respect all internationally proclaimed human rights. We do our best to avoid human rights violations ("do no harm") and to address the adverse human rights impacts of our involvement. To uphold human rights through

partnerships or other collective action. Special attention can be given to the rights of vulnerable groups, including women, children, persons with disabilities and disabilities, indigenous populations, migrant workers, elderly people, etc.

We respect human rights wherever we operate. We strive to ensure that we are not complicit in human rights abuses. We shall, in all contexts, seek ways to honor the principles of internationally recognized human rights, even when faced with conflicting requirements. We only select our partners from first-tier players who comply with the regulations and our requirements. We ensure that the necessary checks are carried out before entering into any business relationship.

## **Labor standards**

We guarantee working conditions that respect workers' fundamental rights, in particular the right to decent working hours. We ban all forms of forced labour, modern slavery, human trafficking and child labour.

Freedom of association – All employees shall be free to form and to join, or not to join, trade unions or similar external representative organizations and to bargain collectively. Information and consultation with employees can be done through formal arrangements or, if such do not exist, other mechanisms may be used.

Forced labor avoidance – Modern slavery and forced Labour shall not be used, the Labour employed shall not be derived from human trafficking, and employees shall be free to leave their jobs with reasonable notice as required by applicable law or contract. No employee shall be required to deposit money or identity documents with the employer. If modern slavery/forced labor/human trafficking is found in the supply chain, local regulatory authorities should be contacted to rescue employees involved in forced work, and to liaise with regulatory authorities to track employee health, etc.

Child labor avoidance – No person who is below the minimum legal age for employment shall be employed. If child Labour is found in the supply chain, local regulatory authorities should be contacted immediately, and follow the result whether the child has been taken to a guardian.

Elimination of discrimination – All employees shall be treated with respect and dignity.

All kinds of discrimination based on partiality or prejudice are prohibited, such as discrimination based on race, gender, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic background, social origin, social status, indigenous status, disability, age, union membership and any other characteristic protected by local law, as applicable.

Employees with the same qualifications, experience and performance shall receive equal pay for equal work with respect to those performing the same jobs under similar working conditions.

## **Environment and sustainable development**

We strive to sustainably reduce the impact of our activities on the environment by complying with international standards and benchmarks. We are also committed to developing innovative and sustainable solutions, and in particular to promoting Responsible Digital Business. We ensure compliance with environmental regulations and understand and respect the Group's environmental and sustainability policies. And ensure that our business partners comply with environmental regulations and group policies. All employees are required to attend awareness raising and training courses organized by the group.

We shall strive to develop, produce and offer products and services with excellent sustainability performance and contribute to the sustainable development of society. We shall strive to continuously improve, with a lifecycle perspective, the environmental performance of our products.

We shall work to continuously reduce the negative impact of our own operations and take a precautionary approach to environmental challenges.

We shall use appropriate methodologies to determine significant issues and aspects, for setting and reviewing objectives and targets, and as a basis for communicating sustainability performance of our operations, products and services.

## **Sustainable procurement**

For social responsibility, CI@NET extends beyond the company's divisions to involve suppliers from around the world. We prioritize respect for basic human rights and diversity. While achieving the basic economic function of "value for money", we also launch sustainable procurement policies and conduct regular audits among suppliers to better monitor their professional ethics and environmental performance and support the improvement of sustainability policies and management systems.

## **Land, Forest and Water rights and Forced Eviction**

We pay high attention to issues such as soil erosion and water pollution, comply with legal requirements for the use of natural resources, and avoid negative impacts on the stability of ecosystems during production and service delivery.

## **Use of Private or Public Security Forces**

We use private or public security teams to ensure the safety of our customers' property and the safety of people inside the premises, to prevent unauthorized entry and to enhance security.

We have made rules and regulations to restrict the behavior of private or public security teams to ensure that they are not overly defensive, can seriously perform their duties, prevent accidents, maintain a safe production and living environment, promptly detect and report any damage, pollution or illegal behavior, and protect the safety and health

of the environment. When performing duties, it is not only necessary to perform duties, but also to build a sense of self-protection and respect the personnel human rights.

## **Conducting due diligence**

CIeNET conducts due diligence on partners or potential partners in the process of business cooperation to understand their business status, credit status, compliance and business risks, etc., to provide a reliable basis for cooperation decisions and reduce cooperation risks.

Partners here include customers, suppliers, charities etc.. When conducting due diligence, pay attention to information security, information authenticity verification, comprehensive assessment and risk control, and comply with legal compliance and ethics. Through scientific evaluation to support CIeNET to select the right business partners to achieve the business objectives.

## **Protecting the image of the Group, our clients and partners**

We are the guarantors of Group's image and must therefore act responsibly and ethically in all circumstances. We must not do anything that could damage the reputation or image of the Group, our customers or our partners.

## **Provide procedure for Reporting Breaches**

CIeNET encourages employees and companies with business dealings to report and expose potential corruption risks or actual corruption phenomena to the supervision and management board through our supervision channel (<https://www.cienet.com/whistle-blowing>) on CIeNET website. All suspected cases will be dealt with in strict accordance with the corruption case handling process.

CIeNET will implement every necessary to preserve confidentiality regarding an employee who exercises its right to report a breach, CIeNET undertakes to ensure that no employee suffers any negative consequences as a result of having had recourse to the above-mentioned systems or as a result of having provided information in good faith in the context of an investigation. The supervisory board will follow the confidential rules to protect reporter:

- Keep the acceptance and investigation of the report as confidential.
- Don't disclose the name/department and company name of the reporter.
- Don't disclose the report to the reported person or department.
- Don't present the original or copy of the report materials and reporter when investigating and verifying the situation.
- Don't share the report materials with others without authorization.

## Supervision

According to the requirements of the company's integrity supervision committee, regularly conduct publicity and education for employees involved in business behaviors. The regulation specifies the various types of corruption that must be prohibited for the purpose of seeking improper benefits, and also sets punishment measures for corruption of different severity to ensure that all kinds of corruption can be punished accordingly.

If you encounter some unfair treatment in the process of cooperating with CI@NET, which seriously affects our cooperation, you can report it through the following channel: <https://www.cienet.com/whistle-blowing>