

# Business Conduct and Ethics

## 1. General rules

1.1 In order to strengthen and promote the construction of the corporate culture of KunShan SuperMix Printing Technology Co., LTD. (hereinafter referred to as the "Company"), establish a good corporate image, standardize the professional ethics and behavior of the employees of the company and its subordinate companies, in accordance with the relevant laws and regulations and the relevant provisions of the Articles of Association, in accordance with the requirements of the "Basic Norms for Enterprise Internal Control", this code is formulated。

1.2 This Code applies to all employees of the Company (hereinafter referred to as "employees").

## 2. Competition and fair dealing

### 2.1 General requirements

The Company requires all employees to comply with competition and fair trade laws and regulations, and to treat the company's customers, suppliers, competitors and other employees fairly.

2.2 Our company and all our employees shall strictly abide by the Company Law of the People's Republic of China and the Law of the People's Republic of China against Unfair Competition, and shall not commit the following acts of infringing trade secrets:

- (1) Obtain the business secrets of the right holder by theft, bribery, fraud, coercion, electronic intrusion or other improper means;
- (2) Disclose, use or allow others to use the business secrets of the right holder obtained by the means mentioned in the preceding paragraph;
- (3) Disclosing, using or allowing others to use the trade secret in violation of the confidentiality obligation or the requirement of the right holder to keep the trade secret;

(4) Instigate, induce or help others to violate the confidentiality obligation or violate the obligee's requirements for keeping the trade secret, and obtain, disclose, use or allow others to use the obligee's trade secret. Where any natural person, legal person or unincorporated organization other than the business operator commits an illegal act listed in the preceding paragraph, it shall be regarded as an infringement of trade secrets. Where a third party, knowing or should have known that an employee, former employee or other unit or individual of the right holder of a trade secret has committed an illegal act listed in the first paragraph of this article, still obtains, discloses, uses or allows another person to use the trade secret, it shall be deemed as infringing on the trade secret. The term "trade secret" as used in this Law refers to the technical information, business information and other commercial information that is not known to the public, has commercial value and has been kept confidential by the right holder.

2.3 Our company and all employees shall not carry out the following acts of confusion, causing people to be mistaken for other people's products or have a specific connection with others:

- (1) Unauthorized use of the name of the commodity, packaging, decoration, etc. which has a certain influence on others where the logo is the same or similar;
- (2) Unauthorized use of enterprise names (including abbreviations, shop names, etc.), social organization names (including abbreviations, etc.), names (including pen names, stage names, translated names, etc.) that have certain influence on others;
- (3) Unauthorized use of the main part of the domain name, website name, web page, etc., which has certain influence on others;
- (4) Other acts of confusion sufficient to be mistaken for another person's goods or to have a specific connection with another person.

### 3. Prevent corruption and bribery

- **3.0 General rules** : Corruption and bribery are strictly prohibited in business activities.

### **3.1 Bribery**

All employees of our company shall not use property or other means to bribe the following units or individuals to seek trading opportunities or competitive advantages:

- (1) Staff of the counterparty to the transaction;
- (2) Units or individuals entrusted by the counterparty to handle related affairs;
- (3) Use power or influence to influence unit or individual of the transaction.

### **3.2 Corruption**

- **3.2.1** Our company and all employees shall not commit the following acts of bribery:
  - (1) In business dealings, he takes advantage of his position to extort money or property from others or illegally accepts money or property from others to seek benefits for others;
  - (2) In business dealings, they take advantage of their positions and, in violation of State regulations, accept kickbacks and handling charges in various names and take them into their own possession.
- **3.2.2** All employees of our company shall not commit the following acts of defrauding the company:
  - (1) Failure to declare personal interests in accordance with company regulations;
  - (2) False reporting of travel, food, office supplies and other expenses;

### **3.2 Discount and Commission**

In the course of trading activities, we may explicitly pay a discount to the counterparty or pay a commission to the middleman. Where a business operator pays a discount to the other side of a transaction or a commission to an intermediary, it shall faithfully enter the account. Operators who accept discounts and commissions shall also truthfully enter the accounts.

## **4. Declaration of conflict of interest**

### **4.1 General Rules**

All employees must act in the interests of the Company as a whole and must act with integrity, ethics and

professionalism towards customers, suppliers, shareholders and the public to reflect its promises. Therefore, all employees must ensure that any financial, commercial or other activities they engage in outside of work are not contrary to the interests of the Company

#### **4.2 Rules on conflict of interest of conduct**

All employees must report any behavior that may lead to a conflict with the interests of the company. Potential conflict situations include, but are not limited to

- (1) Have significant ownership interests or financial arrangements with any of the Company's suppliers, customers, business partners or competitors;
- (2) Have consulting or employment relationships with any of the Company's suppliers, customers, business partners or competitors;
- (3) Direct business with economic entities that have a significant interest in the employee himself or his immediate family;
- (4) Use company assets, intellectual property or other resources for personal gain;
- (5) Accept any gifts, discounts or remuneration of high value from individuals or economic entities seeking to do business with the Company.

#### **4.3 Declaration and approval of conflict of interest**

Directors, supervisors and senior management (deputy general manager and above) should report directly to the audit committee of the company in case of any conflict of interest that has occurred or may occur, and the audit committee of the company will review and make an approval or prohibition decision.

The manager and employees below the manager level report to the person in charge of the administration and human resources department of the company, after receiving the report, the person in charge of the administration and human resource department shall immediately report it to the general manager of the company, who shall submit it to the office meeting of the general manager for deliberation and make a decision on approval or prohibition.

## 5. Compliant gift and entertainment policy

### 5.1 General rules

- In business activities, gift and entertainment policies should be compliant and transparent.

5.2 The purpose of commercial entertainment and gifts is to build goodwill and working relationships, not to gain an unfair advantage from customers. Therefore, no employee shall accept bribes or bribe others in any form under any circumstances. All gifts and entertainment expenses incurred on behalf of the company must be properly reflected in the expense report

5.3 Employees and their family members (including spouses, siblings, parents, in-laws and children) shall also not accept gifts, services, travel arrangements, etc , that may affect their Judgment or conduct when fulfilling corporate obligations. Gifts acceptable to employees are limited to souvenirs with no commercial value, for example notepad, calendar, etc; gifts and cash exceeding RMB 200 must be handed in to the General Manager's office immediately.

- **6. Protection and use of company property**

### 6.1 General rules

- Employees shall actively protect and rationally use company property.

6.2 Company assets, including but not limited to: facilities, equipment, materials, information resources, intellectual property, documents, cash and various electronic documents, etc., must be used for legitimate business purposes.

6.3 All employees have the obligation to protect company property from loss, damage, theft, undersale, improper use, and to comply with all rules and regulations related to the use of Company property. The unauthorized use of company assets by individuals without the permission of the company is strictly prohibited.

## 7. Intellectual property and confidentiality

### 7.1 General rules

Intellectual property shall be protected as the property of the Company and shall be kept confidential in accordance with the requirements of the information security system.

7.2 All inventions and creative works, computer software, technology or trade secrets obtained by employees in the course of performing their duties or through the use of Company materials and technical resources shall be regarded as the property of the Company.

7.3 The company adheres to a strict confidentiality policy. Information about customers, suppliers and other parties obtained in the course of conducting business must be kept confidential.

7.4 All directors, supervisors, officers, managers and employees shall keep sensitive business information, technical information or other material information confidential and abide by the following principles, except where such disclosure is authorized and required by law:

- (1) Any employee shall not move or copy company data, reports, correspondence or other important information without authorization except as required by his/her duties;
- (2) Any employee shall not use or disclose any technical secrets or other confidential data and information for his or her own profit except as required by his or her duties;
- (3) Even outside of work, employees must be vigilant about not disclosing important information about the company or its partners.
- (4) All employees must hand over all documents, data and information upon termination of employment or upon request by their superior;
- (5) The obligation to keep the company's trade secrets confidential persists even after the employee's employment relationship is terminated.

## 8. Financial reporting and disclosure

### 8.1 General rules

In order to make the right business decisions, the company requires that all information be recorded and reported truthfully, accurately and in a timely manner.

8.2 As a listed company on the Beijing Stock Exchange, the Company is required to report its financial position and other significant operational information to the public and the trading regulator. It is the Company's policy to promptly disclose correct and complete business activities, financial position and results of operations.

8.3 The Company's financial policies shall be consistent with all applicable accounting standards and related regulations. All company books, records, accounts and financial reports must be properly and reasonably

maintained, accurately reflect financial transactions, and promptly disclosed in accordance with relevant laws and regulations.

## **9. Implementation of guidelines**

9.1 To help ensure the implementation of this Code, the Company requires all employees to read this Code. The administrative and personnel department of the company shall include the content of this Code in the training of new employees. Departmental heads and employees above are also required to sign the Business Ethics and Conduct Pledge to confirm that they have fully understood and complied with this Code.

9.2 If an employee has any doubts about whether specific conduct meets the requirements of this Code, he or she should immediately consult with his or her supervisor, the Business Ethics Ombudsman.

9.3 For those who violate this Code, the company will give a warning, demotion, dismissal or termination of the labor contract and other penalties. If they violate the law, they will be transferred to the judicial organs for handling according to law. Each employee is individually responsible for his or her actions. A violation of the law or of this Code cannot be justified because it is ordered by a superior.

9.4 Exemptions to this Guideline must be granted in exceptional circumstances and on a case-by-case basis. Only the board of Directors or the audit committee of the company has the authority to make an exemption decision.

## **10. Reports of business ethics violations**

10.1 All employees and stakeholders are obliged to report immediately to the Business Ethics Ombudsman any violation of the law, violation of this Code or other unethical conduct. Failure to report is also a violation of this Code.

10.2 The Company's Business Ethics Ombudsman will take the lead in investigating all reported violations. All reporting investigations are conducted in a confidential manner to protect whistleblowers in good faith and prevent retaliation. During the investigation, all employees are obligated to assist in the investigation.

### **10.3 Reporting channel**



General Manager Chen Yuchuan 18606293699 Email: [chenyuchuan@supermix.com.cn](mailto:chenyuchuan@supermix.com.cn)

Ombudsman for business ethics Qiu Ling 13584930456 Email: [qiuling@supermix.com.cn](mailto:qiuling@supermix.com.cn)

- Forms of acceptance: telephone, E-mail, interview, etc

## **11、 Policy communication, implementation and update**

Internal communication: This Policy shall be posted in writing on the company bulletin board for the knowledge of all employees.

Public communication: this report in the form of the electronic release, the public can download it from the website of KunShan SuperMix Printing Technology Co., LTD. as listed below

<http://www.supermix.com.cn/>

This policy is implemented after its release on January 5, 2022, and is reviewed annually.

Compiled by: Shen Weifu Audited by: Duan Xiaoyong Approved by: 