HYPER STRONG

ANTI-CORRUPTION MANAGEMENT POLICY

Empowering a Sustainable Future



Anti-Corruption Management Policy

Beijing HyperStrong Technology Co., Ltd. (hereinafter referred to as "HyperStrong" or the "Company") adheres to business ethics, continuously improves its anti-corruption management system, enhances employees' compliance awareness through institutional management and training, and works with suppliers to build a fair and honest business environment.

This Policy applies to Beijing HyperStrong Technology Co., Ltd. and all branches and subsidiaries within the scope of its consolidated financial statements. It applies to all aspects of the Company's operational activities, including production and operations, products and services, logistics and distribution, and waste management. It applies to all employees of the Company, including full-time employees, temporary workers, apprentices, student workers, contract workers, and other types of personnel both domestically and internationally, and requires all partners to actively comply with this Policy or similar policy requirements.

Responsibilities

1. The Board of Directors of HyperStrong holds the highest leadership responsibility for the Company's anti-corruption work. The Board of Directors is responsible for urging management to establish a company-wide anti-corruption culture and to establish and improve an internal control system that includes corruption prevention.

2. The management of HyperStrong is responsible for establishing, improving, and effectively implementing anti-corruption procedures and controls, including corruption risk assessment and corruption prevention, and for conducting self-assessments.

3. The Audit Committee of the Board of Directors of HyperStrong coordinates, guides, and supervises the Company's anti-corruption work.

4. The Internal Audit Department of HyperStrong is the standing body for anti-corruption work and is responsible for implementing anti-corruption work across the Company and its branches and subsidiaries.

Key Risk Areas of Anti-Corruption Work

HyperStrong declares that it strictly prohibits all commercial corruption, including but not limited to:

1. **Bribery or kickbacks:** It is prohibited to directly or indirectly offer, give, or accept any form of bribe or kickback to or from any person or related party (including but not limited to customers, owners, contractors, suppliers, and government officials) for the purpose of influencing business decisions or obtaining improper benefits.

2. **Gift acceptance:** Hospitality activities organized or participated in must comply with Company regulations and business practices, follow the principles of reasonableness, compliance, and necessity, must not involve accepting or giving gifts beyond business practices, and must not involve unethical activities.

3. **Fraud:** It is prohibited to obtain Company funds or misappropriate Company property by deceptive means. It is strictly prohibited to transfer profitable transactions or matters of the Company to other external entities or individuals for personal gain.

4. **Conflict of interest:** Concealing conflicts of interest is strictly prohibited. Conflicts of interest shall be proactively and promptly declared in accordance with the Employee Conflict of Interest Declaration System, and recusal measures shall be taken for conflict-of-interest matters.

5. **Money laundering:** Strictly comply with anti-money laundering laws and regulations of the countries and regions where business is conducted, do not facilitate any activities suspected of money laundering or terrorist financing, and resolutely cooperate with regulatory authorities in combating money laundering crimes.

6. **Donations and sponsorships:** Charitable donations or sponsorships used as means of bribery and corruption are strictly prohibited. The Company does not participate in activities intended to intervene in or influence political and public affairs decisions, nor does it make donations or sponsorships to such activities.

7. **Unfair competition:** Strictly comply with the Anti-Unfair Competition Law of the People's Republic of China and relevant international rules, refrain from any form of commercial defamation, false advertising, infringement of trade secrets, or abuse of market dominance, and adhere to fair participation in market competition.

Implementation of Anti-Corruption Measures

Effective Communication and Training

HyperStrong's anti-corruption policies, procedures, and related measures shall be effectively communicated or trained internally in various forms (such as through the Employee Handbook, publication of Company rules and regulations, publicity, or the intranet) to ensure that employees receive training on relevant laws and regulations and professional ethics, understand the concepts involved in the code of conduct, and are able to identify legal and illegal, ethical and unethical conduct. The Company signs an Employee Integrity and Self-Discipline Commitment Letter with employees to ensure that all employees clearly understand the Company's serious attitude toward preventing corruption and their own responsibilities in anti-corruption, and to consciously strive to improve their anti-corruption awareness and skills.

Corruption Risk Assessment and Control Mechanism

When management conducts enterprise risk assessments, corruption risk assessment shall be included. Management shall identify and assess corruption risks at the Company level, business department level, and major account level. The assessment includes the significance and likelihood of corruption risks. These assessments include misappropriation of Company assets, unauthorized or improper revenue or expenditure, leakage of trade secrets, as well as assessment of corruption risks involving the Company's directors and senior management.

Management shall establish and adopt measures to identify, prevent, and reduce fraudulent financial reporting or misuse of Company assets. Necessary internal control measures shall be established for high-risk areas where corruption occurs. These measures include preparing business processes and formulating management systems, linking business corruption and financial corruption risks with control measures, so as to establish and activate control mechanisms at the source of corruption.

Dynamic Management Mechanism for Policies and Regulations

In the design and formulation of policies and regulations, the Company, in accordance with the Administrative Measures for Rules and Regulations, clearly defines the authority of the entities that formulate them. The Company strictly implements the procedures for formulating rules and regulations, strengthens centralized management and unified review of policies, and enhances the scientificity, systematicness, rigor, and binding nature of institutional development, so that the rules and regulations are both practical and operable, and eliminate management loopholes with binding and monitoring features.

Supplier Anti-Corruption Management

HyperStrong signs declaration documents with suppliers to regulate business cooperation, prevent corruption, and safeguard the common interests of both parties. The Company regularly conducts anti-corruption investigations of suppliers, identifies supplier corruption risks, and adopts tiered management with different management measures for suppliers.

Reporting and Oversight Handling Mechanism

The Internal Audit Department of HyperStrong is responsible for establishing and publishing complaint and reporting channels, and for receiving and handling all complaints and reports concerning the Company's internal employees.

Whistleblowing Channels

Reporting Hotline: 010-56352618
Reporting Email: jubao@hyperstrong.com (China)
feedback@hyperstrong.com (Overseas)
Mailing Address: C-F13, Building 2, No.9 Fenghao East Road, Haidian District, Beijing P.R.China

The Internal Audit Department has dedicated personnel who check the reporting email at any time and keep records to ensure that complaints and reports are handled promptly.

The Internal Audit Department investigates complaints and reports. During the investigation, it shall be based on facts and fully obtain evidence. When necessary, it may form an investigation team with relevant departments such as Human Resources or engage external experts to conduct the investigation. The investigation conclusions shall be fed back to the complainant or reporter.

For verified violations, the Company will impose penalties on the relevant personnel in accordance with Company regulations. If a crime is suspected, the case will be transferred to judicial authorities for handling in accordance with law.

After the Internal Audit Department completes the investigation of a corruption case, it shall prepare a corruption case investigation report and report to the relevant direct managers, the Chairman of the Company, the Audit Committee, and the Board of Directors respectively according to the nature of the case.

Whistleblower Protection

HyperStrong encourages employees to report any corruption, bribery, fraud, money laundering, conflict of interest, unfair competition, or other misconduct by real name or anonymously. The Internal Audit Department, leaders at all levels of the Company, and relevant parties are obligated to strictly keep the information of whistleblowers confidential, adopt a "zero tolerance" policy toward retaliation, and resolutely prohibit any form of retaliation.

Supplementary Provisions

This Policy shall take effect on the date of publication and shall be reviewed annually. It is drafted, interpreted, and revised by the Internal Audit Department of HyperStrong. The Company will implement relevant oversight measures, regularly review, and update and revise this Policy as appropriate.

Beijing HyperStrong Technology Co., Ltd.
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The final right of interpretation belongs to Beijing HyperStrong Technology Co., Ltd.