HYPER STRONG



COMPLIANCE CODE OF CONDUCT

Empowering a Sustainable Future

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Chairman's Statement



Beijing HyperStrong Technology Co., Ltd. (hereinafter referred to as HyperStrong or the Company) takes Empowering a Sustainable Future as its mission, upholds the values of Integrity, Innovation, Engagement and Harmony, and strives to become a world-leading innovator in energy technology. The Company conducts business across multiple countries and regions, subject to laws, regulations and international rules, as well as demands and expectations from stakeholders. Compliant operation serves as a fundamental pillar for high-quality corporate development.

The Company adheres to the philosophy of integrating compliance into business, voluntary compliance by all employees and value creation through compliance, and endeavors to build an exemplary enterprise with sound governance, compliant operation, standardized management and integrity.

This Compliance Code of Conduct clarifies basic norms governing production and operation, market activities, business dealings, professional ethics and social responsibilities for the Company and its employees from five dimensions: code of conduct, employees management, corporate governance, social engagement and complaint mechanism. It sets out the general guidelines for compliant operation and compliance expectations for employees and relevant parties.

The Company solemnly commits to strictly abiding by applicable laws, regulatory requirements, industrial codes, business norms, ethical standards and international rules, as well as all this clause. All employees shall perform duties in compliance with laws, treat colleagues, clients, suppliers, contractors and other partners fairly. The Company encourages stakeholders with economic ties to report suspected violations via the established anti-corruption channel. Reporters and relevant information will be kept strictly confidential, and retaliation against whistleblowers is strictly prohibited. Violators will be disciplined in accordance with relevant regulations subject to local laws and jurisdictions. Suspected criminal offenses will be referred to judicial authorities.

Integrity and compliance are everyone's responsibility. Managers at all levels and all employees of the Company shall earnestly study the Code of Conduct for Integrity and Compliance, keep integrity and compliance requirements firmly in mind and put them into practice, safeguard the Company's reputation through concrete actions, drive high-quality corporate development, and strive to build a world-leading energy technology company..

Chairman : Jianhui Zhang



Instructions for Use of Compliance Code of Conduct

〔 Purpose 〕

Committed to being a world-leading energy technology innovator, HyperStrong drives energy transformation via technological innovation, operates lawfully, prioritizes employees wellbeing and social welfare, and advances sustainable industrial development.

This policy defines basic principles and behavioral standards for business decisions, employee duties and stakeholder cooperation. It safeguards sustainable global business growth, prevent business risks, ensures lawful operation and protects corporate interests and reputation.

〔 Scope of Application 〕

This policy applies to HyperStrong and all its employees. Third parties acting on behalf of or for the interests of the Company shall also comply with these provisions.

Subsidiaries, branches, representative offices and liaison offices shall implement the policy via corporate governance procedures. It serves as a key criterion for supplier selection, investment selection and partner evaluation. Non-compliant conduct may affect business cooperation. Invested enterprises and partners shall maintain compliance standards no lower than the requirements specified in the 'Compliance Code of Conduct'.

〔 Usage Requirements 〕

All employees of HyperStrong should carefully study the "Compliance Code of Conduct," master the basic requirements of integrity and compliance as well as relevant specific provisions, actively participate in compliance training, make compliance commitments, and strictly adhere to the requirements of the "Compliance Code of Conduct" in their work.

Managers shall take the lead in abiding by rules, supervise subordinates, conduct regular communication on compliance performance and foster a sound compliance culture.

This policy sets forth fundamental behavioral principles. In addition, employees shall also observe all applicable laws and internal regulations.

In case of conflicts between local laws, public morality and corporate compliance standards in overseas operations, reports shall be submitted promptly to the compliance management department. Adjustments shall be made reasonably while balancing local legislations and corporate principles. If there are differences only in compliance standards, the strictest standard should be followed.

For any compliance questions or uncertainties, please consult HyperStrong's Compliance Management Department in a timely manner.

Definition of Compliance

Compliance means corporate operation and employee performance conform to applicable laws, regulatory provisions, industrial norms, international treaties, articles of association, internal rules and signed compliance commitments.



Compliance Objectives

Cultivate compliance culture, realize full-employees, full-business and full-process compliance, systematically prevent and defuse compliance risks, and lay a solid foundation for building a world-class energy technology enterprise.

Compliance Philosophy

Integrate compliance into business, voluntary compliance by all employees, create value via compliance.

Management Principles

HyperStrong's compliance management adheres to the following principles:

Comprehensiveness

Adhere to covering compliance management requirements across all business areas of HyperStrong, the company's leadership, all departments, and all employees, throughout all stages such as decision-making, execution, supervision, and feedback, and reflected in decision-making mechanisms, internal controls, business processes, and all other aspects.

Applicability

Compliance management adapts to business scope, operating regions, organizational structure and scale, balances cost and efficiency, ensures practicality and optimizes the management system dynamically.

Responsibility Enhancement

Persons responsible for business operations must also bear compliance responsibilities. Business departments and units must fulfill their primary responsibility for compliance management when conducting business, establish an effective compliance management system, and ensure that all business activities are carried out in compliance.

Collaborative Coordination

Align compliance management with legal affairs, audit, internal control, ethical supervision and comprehensive risk management to ensure effective system operation.

Objectivity and Independence

Evaluate corporate and individual conducts impartially in accordance with laws. The compliance department performs duties independently with full access to information and investigation power without external interference.



Company and Employees

Building Harmonious Labor Relations

Lawful Employment

Labor contracts shall be concluded, performed,modified, terminated or dissolved in accordance with laws. Employees shall submit authentic and complete personal documents during recruitment, transfer and compliance inquiries. HyperStrong will conduct background checks on employees in accordance with compliance management requirements.

Treat employees equally

Discrimination and harassment are prohibited. All employees enjoy fair working conditions.

Recruitment, compensation and benefits, transfer, reward and punishment are determined based on personal skills, competence and performance.

Protection of Employees' Legitimate Rights and Interests

HyperStrong respects and cares for its employees, improves occupational health and labor protection systems to safeguard physical safety. Child labor are strictly forbidden. Any act infringing statutory employee rights is prohibited.

Democratic procedures are adopted when formulating rules involving employees interests. At that time, by following democratic procedures, employees' opinions and suggestions will be fully heard, and their legal rights and interests will be fully protected.Training systems are improved to boost professional capabilities and personal development.

Creating a Positive Working Atmosphere

A people-oriented culture is advocated to support personal growth. Employees shall be dedicated, abide by professional ethics and disciplines, and enhance work efficiency. Mutual respect and sincerity are encouraged. Discriminatory, harassing and unprofessional remarks and behaviors are banned.

Avoidance of Conflicts of Interest

Employees shall distinguish personal interests from corporate benefits. Engaging in competing businesses or assisting rivals is forbidden. No improper gains shall be sought by taking advantage of positions. Official authorization is mandatory for business negotiations, bidding, guarantee provision, public speech and external publicity under the Company's name.

Potential interest conflicts must be reported timely, and relevant personnel shall recuse themselves from related work.



Corporate Governance and Operation

Corporate Governance

HyperStrong governs itself in line with laws and articles of association, establishing balanced decision-making, execution and supervision mechanisms. Directors and senior management shall fulfill fiduciary and diligent obligations, does not exceed its authority or make decisions in violation of procedures, refrain from ultra vires acts and behaviors damaging corporate interests and reputation. As a listed company, standardized internal governance ensures lawful business operation.



Quality, Safety and Environmental Protection

All applicable laws and standards on product quality, work safety, employees health and public security shall be strictly observed.

Quality Management

Domestic and overseas quality regulations, contractual terms and standards are followed. The quality management system is continuously optimized. Strict product testing and quality control are implemented throughout procurement, production, storage, transportation and on-site management. Employees shall clarify post quality liabilities and be accountable for work outcomes.

Safety Management

Safety development is prioritized. Work safety systems and labor protection standards are enforced. Regular physical examinations and safe working environments help mitigate hazards. HyperStrong commits to mitigating the health and safety impacts of its products and services on customers through all applicable means.

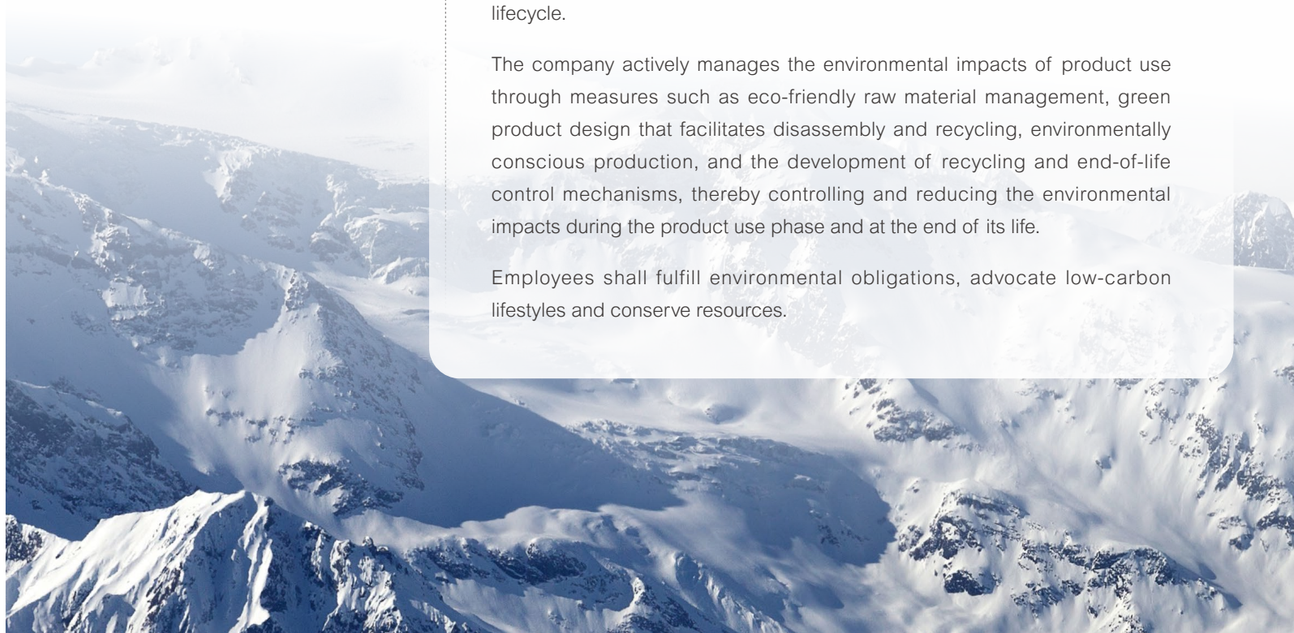
Employees shall comply with operational rules, receive safety training and report hidden dangers immediately.

Environmental Protection

Environmental protection is a core operational priority. The environmental management system complies with domestic and overseas legislations. Pollution emission, noise and waste disposal are controlled throughout project lifecycle.

The company actively manages the environmental impacts of product use through measures such as eco-friendly raw material management, green product design that facilitates disassembly and recycling, environmentally conscious production, and the development of recycling and end-of-life control mechanisms, thereby controlling and reducing the environmental impacts during the product use phase and at the end of its life.

Employees shall fulfill environmental obligations, advocate low-carbon lifestyles and conserve resources.



Finance, Taxation and Assets

HyperStrong strictly complies with laws and regulations regarding finance, taxation, and asset management.

Fiscal and Tax Administration

Accounting standards and financial regulations are strictly implemented. Authentic, accurate and timely financial records and reports are required. Tax liabilities are fulfilled legally, with complete tax documents properly retained.

Asset Management

Concealing property and fabricating debts to impair legitimate rights are prohibited. Corporate assets shall be properly preserved. Asset purchase and disposal follow legal procedures, and illegal use of assets is forbidden.

Intellectual Property Protection

Intellectual property laws are strictly observed. Independent intellectual property is protected legally, while third-party intellectual rights are fully respected. HyperStrong will lawfully and compliantly handle the protection, use, licensing, transfer, and other matters related to intellectual property, and will pursue infringement in accordance with the law.

Unauthorized copying, revision and destruction of corporate intellectual achievements are banned. Service inventions accomplished during employment belong to the Company unless otherwise agreed.





Information Security and Disclosure

Relevant laws and international rules on cybersecurity, data protection and File management are complied with,abide by relevant international rules and treaties, do not infringe on the rights and interests of others, and also legally protect one's own legitimate rights and interests from infringement.

Cybersecurity Enhancement

Properly establish a cybersecurity system, adhere to bottom-line thinking, prepare emergency plans, and conduct emergency response drills to prevent cybersecurity risks. Regularly carry out cybersecurity risk assessments to improve the capability to handle cybersecurity incidents.

Employees should use the internet in accordance with laws and regulations and must not use the internet to spread illegal or false information. HyperStrong will strengthen cybersecurity awareness, and enhance network security protection and emergency response.

Confidentiality and Data Protection

HyperStrong strictly complies with the applicable confidentiality-related laws and regulations of the company, actively prevents and manages according to law, keeps state secrets and sensitive information confidential, protects trade secrets, and avoids leakage incidents.

HyperStrong legally collects, manages, stores, uses, shares, and transmits relevant personal information in accordance with applicable laws and regulations, ensures the security of personal information, protects personal privacy, safeguards the legal rights and interests of data subjects, and effectively prevents and responds to risks related to privacy protection and data security.

Employees shall strictly adhere to national confidentiality laws and regulations and HyperStrong's confidentiality system. If any leaks or potential risks are discovered, they should be immediately stopped and reported so that the company can take timely remedial measures.

Information Disclosure Management

HyperStrong fully, accurately, and timely discloses relevant information in accordance with applicable laws, regulations, and regulatory requirements. Employees are prohibited from using material non-public information for securities trading; employees who due to their work or responsibilities, have access to HyperStrong's undisclosed financial information, operational information, or other important information, shall not disclose or provide such information to any third party in any way or by any means without authorization. It is strictly forbidden to use such information for illegal trading or to obtain illegal benefits.

Employees shall comply with the laws and regulations of the countries (or regions) involved in the business regarding the management of insider information and information disclosure.

Company and Society

Community Relations

Local public interests shall be respected during business activities. Communication with local communities and non-governmental organizations is maintained, and disputes are resolved legally through negotiation.

Business Transactions

Compliance Due Diligence

Necessary compliance investigation and risk assessment shall be conducted prior to cooperation with third parties.

Business Partners

All partners shall meet HyperStrong's compliance requirements. Third-party organizations and individuals representing HyperStrong in business activities must comply with all relevant laws and regulations as well as HyperStrong's compliance requirements; other third-party organizations should actively fulfill applicable compliance requirements.

HyperStrong and its business partners shall ensure that any statements, information, and business representations provided to each other are accurate and truthful, and shall guarantee mutual confidentiality of trade secrets and sensitive information.

Anti-Corruption and Anti-Commercial Bribery

HyperStrong must at all times comply with applicable anti-corruption and anti-commercial bribery laws and regulations, and is prohibited from engaging in any form of bribery or acceptance of bribes in any business dealings.

No employee shall, for the purpose of influencing business decisions or obtaining improper benefits, directly or indirectly provide, give, or receive any form of bribe, kickback to or from any person or related party (including but not limited to clients, owners, contractors, suppliers, and government officials).

Fair Competition

HyperStrong strictly abides by laws and regulations related to anti-unfair competition and anti-monopoly, as well as internationally accepted standards, and is committed to conducting market competition fairly and honestly, respecting and treating HyperStrong's suppliers, contractors, competitors, and other relevant third parties fairly.

Employees must not violate the Anti-Unfair Competition Law or the Anti-Monopoly Law, and must not exchange sensitive information with competitors.

Any agreements reached by HyperStrong with competitors or relevant third parties that contain terms that may negatively affect competition (such as exclusivity clauses, pricing, alliances, territorial restrictions, price discrimination, exclusion of competition, and the exchange of sensitive technical or business information) must undergo legal compliance risk assessment and approval to ensure compliance with relevant laws and regulations.

HyperStrong shall apply to the anti-monopoly enforcement agency in accordance with the law if it acquires control over other operators or is able to exert decisive influence over other operators through mergers, acquisition of equity or assets, contracts, or other means, and meets the standards for reporting operator concentration.

Anti-Money Laundering

Anti-money laundering rules and internal control procedures are implemented.

HyperStrong expects to conduct business with reputable commercial partners and use resources from legal sources. Employees should fully understand their business partners, not accept cash payments or financial product transactions that do not comply with regulations, not make payments to non-transaction accounts or abnormal accounts, and avoid transactions with parties suspected of money laundering. If any suspicious activity is encountered, or if there are any concerns before further transactions, relevant departments should be consulted promptly, and relevant evidence should be retained.

Export Control and Economic Sanction Rules

HyperStrong adheres to non-discrimination and fair trade principles, complying with official trade control and sanction measures,comply with trade control, sanctions, embargoes, and trade remedy measures that are legally issued by competent authorities with jurisdiction in China or in countries (regions) involved in overseas business and have compulsory binding force, and do not implement any discriminatory exclusion requests initiated by private, non-official, third-party entities against specific countries, regions, enterprises, or individuals.

Other International Compliance Obligations

Overseas investment and trade activities comply with local laws and international norms. Local cultures, religions and customs are respected.

Social Responsibility

Social Contribution

HyperStrong pursues the unity of social and economic benefits, striving to create the optimal comprehensive value for the economy, society, and the environment, achieving sustainable development together with local communities, and realizing mutual benefits and win-win results with business partners. HyperStrong is enthusiastic about public welfare, leveraging its industry advantages to actively fulfill social responsibilities and give back to society through donations, disaster relief, support for education, and various other charitable activities, while achieving its own stable development, contributing to the promotion of social harmony and progress.

Industry Development Promotion

HyperStrong actively keeps track of the latest technologies and market trends in the industry. Through publishing books, participating in industry conferences, and organizing on-site exchanges, it communicates and learns from peers, leverages each other's strengths, and showcases its technological capabilities and product advantages to gain more market opportunities.

All employees of HyperStrong should actively learn and understand industry knowledge and continue to grow; without involving sensitive information, they should actively communicate and learn from peers to leverage each other's strengths.





Consultation and Complaint Handling

Compliance Consultation

Employees may consult supervisors, functional departments and the compliance management team about compliance issues.

Compliance Complaints

All personnel have the obligation to report violations and compliance risks related to the company's operational and management activities, which include, but are not limited to, the formulation and implementation of rules and regulations, decision-making on matters, contract signing, project investment and operation, etc. Meanwhile, employees, suppliers, business partners, customers, and other stakeholders may report or raise concerns regarding any violation of this policy or any related issues to the company, either anonymously or with real identity, via the designated submission email. Such issues include, but are not limited to, fair competition, information security and trade secret protection, data security and privacy protection, community health and safety, product recalls, product quality, and environmental and safety matters arising from product use.

HyperStrong adopts a "zero tolerance" policy toward any form of threat, attack, harassment, or retaliation against complainants or whistleblowers, and strictly prohibits any department or employee from engaging in such conduct. The personal information of complainants and the information they provide will be kept strictly confidential to protect whistleblowers from retaliation.

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

Execution and Feedback

Managers at all levels of HyperStrong are responsible for ensuring the implementation of the 'Compliance Code of Conduct.' Each department and subsidiary at all levels should regularly monitor and check the applicability of the 'Compliance Code of Conduct' based on changes in laws, regulations, and the business environment, and promptly report feedback to HyperStrong's compliance management department.

Rewards and Accountability

Employees with outstanding compliance performance and contributions to preventing major compliance risks, mitigating the Company's adverse impacts and reducing its losses will be commended and rewarded. Violators shall be held accountable in accordance with laws and internal regulations. Suspected criminal offences will be referred to judicial authorities.



Supplementary Provisions

This policy takes effect from the date of issuance and shall be reviewed annually. It is drafted, interpreted, and revised by the Internal Audit Department. HyperStrong will implement relevant supervisory measures, regularly review, and update or revise this policy as appropriate from time to time.

Beijing HyperStrong Technology Co., Ltd.
2026
2nd Edition
The final right of interpretation belongs to Beijing HyperStrong Technology Co., Ltd.

