

Hengtong Optic-Electric Supplier Code of Conduct

I. Preface

1. Purpose

To promote global sustainable development and build a green, transparent, and responsible supply chain system, Hengtong Optic-Electric Co., Ltd. (hereinafter referred to as “HTGD”) has established this *Supplier Code of Conduct* (hereinafter referred to as “the Code”). The Code sets forth the fundamental requirements for suppliers in compliance, environmental protection, social responsibility, and sustainable development. It serves as an important foundation for the company’s supply chain management and cooperation with suppliers.

2. Scope of Application

This Code applies to all suppliers and business partners providing products or services to HTGD and its subsidiaries. Suppliers shall comply with all requirements outlined in this Code and communicate them to their downstream suppliers and subcontractors.

II. Compliance and Ethical Business Practices

1. Compliance with Laws and Regulations

Suppliers must strictly comply with the laws, regulations, and industry standards of the countries and regions in which they operate. This includes, but is not limited to, labor, environmental, tax, antitrust, export control, and economic sanctions regulations. Any form of illegal or non-compliant conduct is strictly prohibited.

2. Anti-Bribery and Anti-Corruption

Suppliers shall not offer or accept bribes, kickbacks, commercial inducements, or any other improper benefits in any form. All business activities must be conducted fairly, transparently, and traceably to safeguard the reputation of both HTGD and the supplier.

3. Conflict of Interest Management

Suppliers must identify and disclose potential conflicts of interest in a timely manner, adopt effective measures to prevent harm to HTGD's interests, and ensure business decisions are independent and transparent.

III. Human Rights and Labor Standards

1. Prohibition of Forced and Child Labor

Suppliers must not employ child labor, forced labor, bonded labor, or any form of illegal employment. During recruitment, suppliers shall not charge fees to employees or withhold identity documents, labor contracts, or other personal property.

2. Wages, Working Hours, and Rest Rights

Suppliers shall comply with applicable laws and regulations regarding wages, working hours, and benefits. Wages must be paid in full and on time. Reasonable working hours, statutory holidays, and overtime regulations must be observed.

3. Equality and Non-Discrimination

Suppliers shall provide a fair and equal workplace, free from discrimination based on gender, age, race, religion, nationality, marital status, or other personal characteristics.

IV. Health, Safety, and Working Environment

1. Occupational Health and Safety

Suppliers must provide a safe and healthy working environment, establish occupational health and safety management systems, identify and control potential risks, and prevent workplace accidents.

2. Training and Emergency Preparedness

Suppliers shall conduct regular safety training to enhance employee awareness and establish effective emergency response plans and drills to ensure timely handling of incidents.

3. Safety Culture Promotion

Suppliers are encouraged to foster a strong safety culture, motivating employees to identify, report, and eliminate potential risks, thereby ensuring full participation in workplace safety management.

V. Environment and Sustainable Development

1. Legal Compliance and Pollution Prevention

Suppliers must comply with environmental protection laws and regulations and take necessary measures to prevent pollution, minimizing environmental impacts during production and operations.

2. Energy Conservation, Emission Reduction, and Resource Recycling

Suppliers shall actively implement energy-saving and emission-reduction initiatives, reduce carbon emissions and energy consumption, and promote waste recycling and resource efficiency.

3. Green Materials and Responsible Sourcing

Suppliers are encouraged to prioritize the use of environmentally friendly materials and processes, ensure the legality and compliance of procurement sources, and drive the green transformation of the supply chain.

4. Carbon Footprint and Environmental Product Declarations (EPD)

Where feasible, suppliers shall provide product lifecycle environmental information, including carbon footprint data and Environmental Product Declarations (EPDs), to enhance environmental transparency.

VI. Supply Chain Responsibility and Management

1. Raw Material Sourcing and Conflict Minerals Control

Suppliers must ensure raw materials are sourced legally and responsibly, avoiding the use

of conflict minerals, high-risk environmental materials, or materials associated with severe social controversies.

2. Supply Chain Transparency and Traceability

Suppliers shall establish traceability systems to ensure that their downstream suppliers and subcontractors also comply with this Code, thereby ensuring supply chain transparency and control.

3. Supplier Assessment and Continuous Improvement

Suppliers are expected to actively participate in HTGD's regular audits and evaluations, continuously improving management standards and enhancing performance in compliance, environmental, and social responsibility.

VII. Information Security and Intellectual Property

1. Protection of Confidential Information

Suppliers must properly safeguard HTGD's and customers' confidential business information, proprietary data, and technical documents. Unauthorized disclosure, transfer, or misuse is strictly prohibited.

2. Data Security and Privacy Management

Suppliers shall ensure data security and personal information protection, complying with applicable data protection and privacy laws to prevent unauthorized use or disclosure.

VIII. Oversight and Enforcement

1. Audit and Assessment Mechanisms

HTGD will regularly audit suppliers' compliance with legal, environmental, and social responsibility requirements. Suppliers shall cooperate by providing necessary documentation and on-site support.

2. Reporting and Whistleblowing

Suppliers and their employees may report suspected violations through designated

channels established by HTGD. Reports will be treated confidentially and investigated in accordance with applicable laws.

3. Consequences of Non-Compliance

Suppliers found in violation of this Code may face warnings, mandatory corrective actions, order reductions, termination of cooperation, or legal accountability, depending on the severity of the violation.

IX. Commitment and Effectiveness

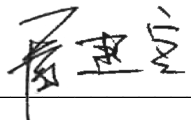
1. Continuous Improvement and Collaboration

Suppliers commit to continuously improving compliance, environmental protection, and social responsibility practices, actively participating in relevant training and improvement initiatives, and working with HTGD to achieve green transformation and high-quality development.

2. Effectiveness and Validity

This Code shall take effect upon publication and remain valid for five years. In the event of major changes or adjustments, updated provisions will be announced separately.

Hengtong Optic-Electric Co., Ltd.

Authorized by: 

Position: General Manager

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