

TIANMA MICROELECTRONICS CO., LTD.

Anti-Corruption Policy

I. Principle

TIANMA MICROELECTRONICS CO., LTD. (hereinafter referred to as "TIANMA") believe that the highest standards of integrity and ethics must be followed to in all business transactions. Our business participants are expected to avoid any form of bribery, embezzlement, extortion, and misappropriation of funds. It is necessary to carry out monitoring and strengthened procedures to ensure compliance with ethical business conducts. Together, we strive to cultivate a transparent and well-structured corporate operating environment.

II. Scope

This Policy applies to TIANMA MICROELECTRONICS CO., LTD., our wholly-owned or majority-owned subsidiaries, directly or indirectly managed companies (collectively referred to as "TIANMA"), and our employees.

For suppliers, consultants, customers, and other business partners, we actively advocate and encourage their compliance with this Policy.

III. Reference

- United Nations Convention against Corruption
- Laws and regulations applicable in the location of operations

IV. Guidelines

- Comply with the Law, Uphold the Integrity

We are all committed to complying with anti-corruption laws and regulations, upholding integrity, honesty, diligence, and professionalism, while protecting the interests and reputation of the company.

- Combat Corruption, Foster Self-discipline.

All of us are devoted to setting a positive example by keeping away from any sort of corruption. We offer regular anti-corruption alerts and training to enhance

the awareness of all our employees. We have established reporting and whistleblowing systems for combating corruption.

V. Compliance Management System

We have established a comprehensive compliance management system, comprising the Board of Directors, management team, compliance management committee, business and functional departments, compliance management department, and supervisory department to ensure the implementation of corresponding compliance responsibilities. The Discipline Department is in charge of organizing, coordinating, and overseeing the efforts in combating commercial bribery, while relevant business departments take the primary responsibility for managing compliance within their respective scopes.

VI. Key Areas

1. Business Hospitality

When engaging in business activities, we are dedicated to upholding the principles of legal compliance, diligence, integrity, frugality, standardization, and transparency. We will strictly adhere to relevant management regulations concerning the duties fulfillment, business expenses, and work style.

Note: Business hospitality refers to activities involving the reception of customers, joint venture partners, and economic and trade liaison and inspection delegations in business negotiations or cooperation. This mainly includes organizing business banquets, arranging transportation for guests, providing accommodations, as well as offering gifts.

2. Kickbacks, Discounts, and Commissions

During our business activities, we and our employees will not provide or accept kickbacks under any circumstances. While we can offer discounts to our partners, we will always openly disclose them. We may pay commissions for the services of legitimate intermediaries with appropriate business qualifications. However, we'll sign a service agreement with them that clearly outlines the rights and responsibilities of both parties, especially concerning commission payments. All commission expenses will be accurately documented in our financial records. Our employees will not accept commissions through abusing their positions for

personal benefits.

Note: Kickbacks involve an operator returning a certain percentage of the commodity price outside formal accounting channels. Discounts refer to concessions made by operators in commodity sales through clear and explicit pricing adjustments. Commissions represent compensation provided to legitimate intermediaries who offer services within market transactions.

3. Gifts and Cash

We and our employees will not accept gifts or cash from our customers, or individuals and affiliations under our management and supervision. Our employees will refrain from accepting gifts or cash from entities or individuals associated with their business responsibilities that could potentially compromise the impartial fulfillment of duties. Furthermore, our employees will avoid taking advantage of occasions such as holidays, weddings, funerals, job relocations, or children's schooling for personal benefits in the form of gifts or cash (excluding normal interpersonal exchanges between relatives or gifts organized by superior units at the same level for consolation).

Note: "Gifts" encompass high-end durable items; gold, silver, jade and other precious stones; high-end electronic products; high-end crafts; items of significant historical value or commemorative significance; as well as other valuable items. "Cash" refers to currency notes/coins along with gift vouchers/certificates/cards.

4. Donations and Sponsorships

When making donations and sponsorships, we will carefully evaluate the potential risk of commercial bribery and, when necessary, conduct investigations and assessments on the recipient referring to the due diligence process.

Note: Donations and sponsorships involves the company's gratuitous contributions towards charitable activities and social development. While anti-commercial bribery laws do not explicitly prohibit donations and sponsorships, they are not permissible if intended to secure improper advantages.

5. Recruitment

Offering employment or internships to government officials or relatives of

related stakeholders could be considered as commercial bribery. We will comply with the regulations in recruiting and ensure an open and transparent process that the recruitment candidates meet TIANMA's criteria and requirements. It is strictly prohibited to adopt backdoor operations or lower standards to recruit specific individuals. All recruited employees will receive equal consideration in terms of salary, promotion, and rewards and disciplinary actions.

6. Choosing Business Partners

When engaging in business activities, we will pay close attention to the management of suppliers, agents, distributors, and other business partners to mitigate the risk of commercial bribery or corruption.

Note: Business partners refer to suppliers, contractors, subcontractors, agents, distributors, joint venture partners, and customers, etc., who are the counterparties or participants in business activities.

7. Accounting Records and Documents

Commercial bribery often involves inaccurate accounting records and documents. Therefore, all business activities and asset disposal at TIANMA will strictly follow relevant procedures and be recorded in accordance with applicable accounting standards. The content of the records and documents will be detailed, accurately reflecting all transactions and other business activities. We will ensure that any records and documents do not contain any false, fabricated, or misleading information. Illegal off-the-books activities and the establishment of secret accounts are strictly prohibited.

8. Other

Unreasonable exemptions from obligations and inappropriate information sharing may raise concerns about potential commercial bribery, and in some cases, even constituting commercial bribery. To address any risks of commercial bribery not explicitly mentioned in this policy, all employees will actively identify them in actual work and report any perceived risks or potential instances of commercial bribery. For example, unreasonable exemptions from obligations and inappropriate information sharing will be reported and investigated in accordance with relevant regulations.

VII. Violation Reporting, Investigation, Accountability, and Protection of Whistleblowers

Due to the unique nature of anti-commercial bribery, we will prioritize the establishment of mechanisms for reporting violations, conducting investigations, ensuring accountability, and protecting whistleblowers. All employees are expected to promptly report any indications or instances of commercial bribery encountered during their duties to the Discipline Inspection Department via the following channels:

- **Mail: Discipline Inspection Department, TIANMA Building, No. 88 Daxin Road, Nanshan District, Shenzhen, China. (518052)**
- **Phone: 0755-36351948 or 18502133904 (dedicated Complaint Hotline)**

We are dedicated to protecting the confidentiality of anonymous reports and preventing any form of retaliation against the reporter, while steadfastly upholding the Whistleblower Protection Policy.

VIII. Review and Update

TIANMA will regularly review and update this Policy, and ensure its approval..

This Policy is made in both English and Chinese. In case of any discrepancy between the two versions, the Chinese version shall prevail.