

TIANMA MICROELECTRONICS CO., LTD.

Whistleblowing and Whistleblower Protection Policy

I. Principle

To address potential ethical issues in business, enhance corporate governance, and encourage the reporting of inappropriate behavior or unlawful activities within our organization, TIANMA has established this policy to formalize a standardized whistleblowing process and protect employees, suppliers, and other stakeholders who report misconduct. This policy ensures that individuals can report concerns without fear of retaliation.

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. Guidelines

We are committed to principles of fairness, impartiality, objectivity, and evidence-based reporting is encouraged. We support the option for filing complaints with real names, as well as anonymously, and we are dedicated to strictly protecting the confidentiality of complainants' information.

IV. Reporting Scope and Management System

The Discipline Department is accountable for supervising the whistleblowing process, which covers reports related to suspected violations of rules and regulations, improper conduct in duty performance, internal control issues, and auditing affairs within its domain. Any complaints outside this scope will be referred to relevant departments for handling.

V. Reporting Rules

1. We encourage and support the submission of complaints and appeals under
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real names, allow anonymous reporting, ensure timely responses or processing, strictly keep the information of the reporting and appealing party confidential, and strictly prohibit any form of retaliation.

2. When dealing with complaints and appeals, we are committed to the principles of fairness, justice, objectivity, and evidence-based investigation. We will pay significant attention to evidence and investigative leads. We will establish a system for personnel recusal and make the reporting and appealing procedures public and enforce them strictly.
3. We will set up, make known, and keep open accessible channels for receiving letters, visits, phone calls etc., and promptly handle and deal with complaints and appeals from internal and external relevant parties.
 - For those submitting written letters to report issues, the designated staff will carefully go through the contents of the letter as soon as they receive it.
 - For the visitors coming to report issues, at least two staff members will take charge of receiving, dealing with complaints, and documenting the information and concerns they express.
 - For those reporting issues by phone, the assigned staff will take the responsibility of answering them and documenting the essential information and details regarding the callers' concerns.
 - For those reporting issues by sending electronic materials through mobile text messages, the assigned staff will promptly organize the received electronic materials into hard copy documents.
4. The Discipline Inspection Department will neither postpone nor accumulate the handling of reports related to violations. We will come up with methods for disposal, formulate interview and inquiry plans or preliminary verification schemes, and complete the approval procedures within 30 days after receiving the problem clues. Reports beyond the scope of discipline inspection business need to be transferred to relevant departments for further processing within 5 working days upon reception.

VI. Protection of Whistleblowers

1. If the whistleblower uses their real name or the name of their organization and provides specific contact information such as a phone number, we will verify the authenticity of the report via telephone or in-person. Reports that are signed but do not contain the informant's actual name, organizational affiliation, or cannot be verified for authenticity will be treated as anonymous reports.
2. We do not allow unauthorized investigations into the handwriting, Internet Protocol (IP) address, or other identifying information of anonymous whistleblowers. If it is necessary to ascertain the identity of an anonymous whistleblower who is suspected of making false reports or violating rules and regulations, it is essential to report for approval through hierarchical channels.
3. The whistleblower is entitled to the following rights throughout the process of reporting and appealing:
 - The right to report the violations of regulations and disciplinary infractions committed by employees;
 - The right to appeal if dissatisfied with the investigation and subsequent actions taken regarding reported issues;
 - The right to request an explanation and a responsible reply within a specified period after making a report or appeal;
 - The right to request that relevant staff members recuse themselves from involvement in their case;
 - The right to report cases of negligence or other violations of regulations and discipline by investigating personnel;
 - The right to seek protection from the receiving or handling department if their legitimate rights are threatened or infringed upon as a result of reporting or appealing;
 - The entitlement to rewards, in accordance with regulatory provisions, if

concrete evidence provided by the whistleblower has significant impact on major cases or contributes significantly to recovering economic losses.

VII. Reporting Channels

- **Correspondence/Visit:** The Discipline Inspection Department, TIANMA Building, No.88 Daxin Road, Nanshan District, Shenzhen, China. (518052)
- **Telephone:** 0755-36351948 or 185 0213 3904 (Complaint and Reporting Hotline)

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.