Introduction

Supplier Code of Conduct (the "Code") establishes standards for suppliers to ensure compliance with the standards that SDP Technologies Co.,Ltd. (hereinafter referred to as "SDPC") requires and which are essential for mutual growth. In particular, Suppliers shall ensure safe working conditions, treat its employees with respect and dignity, ensure all business operations are operated in an environmentally friendly and responsible manner, and conduct all of its activities ethically and in full compliance with all applicable laws, rules and regulations.

The Code is a mandatory requirement on the Supplier by SDPC. The Code shall be adopted by all Suppliers that manufactures products and/or perform services for SDPC. All Suppliers shall adhere to the Code and ensure all of their direct or indirect sub-suppliers related to assembly, components, raw materials and packaging comply with the Code. SDPC or third party auditors appointed by SDPC (“Auditors”) may visit the Supplier to evaluate whether the Supplier is complying with the Code. If there are any conflicts between the Code and any other local regulations, the higher standard shall prevail. The Code is written in Chinese and English, in case of discrepancies, the Chinese version shall prevail.

1. Labor and Human Rights

Suppliers must uphold the human rights of workers and treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

1.1 Freely Chosen Employment

SDPC supports the right to work voluntarily and is committed to banning forced labor. All work must be voluntary. Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Employers (Suppliers or Labor dispatch agencies) or Recruitment agencies shall not require workers to pay deposits or recruitment fees as part of their employment. In addition, labor conditions must be provided in written form to the workers in the language that they are able to understand.

1.2 Young Workers

Child labor must not be used in any stage of manufacturing. The term "child” refers to any person under the age of 16, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. If any child labor is detected, the Supplier shall immediately take required action steps. The Supplier shall immediately stop such child labor and improve the reviewing process regarding the age of the worker during recruitment. The use of legitimate student intern programs, which comply with all laws and regulations, is supported. Young workers over the legal minimum age for employment may be hired, however, young workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers, including night shifts and overtime, or work longer hours than is permitted by local law.

1.3 Working Hours

A workweek should not be more than 60 hours per week including overtime, except in emergency or unusual situations. Weekly working hours are also required not to exceed the maximum set by local law.

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Workers should be allowed at least one day off every seven days.

1.4 Wages and Benefits
Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. The basis and the element on which workers are being paid is to be provided in a timely manner via pay stub, similar documentation or supplier intranet in a language that workers can understand.

1.5 Humane Treatment
There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

1.6 Non-Discrimination
Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.
In addition, unless medical tests are required for legal or safety reasons, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

1.7 Freedom of Association
In conformance with local law, Suppliers shall respect the right of all workers to form and join worker council or trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.
Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

2. Health and Safety
Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers shall ensure to maintain safe and healthy working conditions according to the local laws and regulations.

2.1 Occupational Safety
Potential or actual worker exposure to safety hazards (e.g., chemical, electrical, and other energy sources, fire, vehicles, and fall hazards) are to be identified, assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lock out/tag out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to

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pregnant women and nursing mothers including those associated with their work assignments, and include reasonable accommodations for nursing mothers.

2.2 Emergency Preparedness
Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

2.3 Occupational Injury and Illness
Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of injured or ill workers to work.

2.4 Industrial Hygiene
The exposure of workers to biological agents (e.g. chemicals used in manufacturing sites, pathogenic viruses etc.) and physical agents (e.g. high temperatures, radiation) are to be identified, evaluated and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering (e.g. the improvement of production facilities) or administrative (e.g. laws and regulations) controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, workers are to be provided with appropriate, well-maintained, personal protective equipment and protective programs . Protective programs shall include educational materials about the risks associated with these hazards.

2.5 Physically Demanding Work
Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

2.6 Machine Safeguarding
Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

2.7 Sanitation, Food and Housing
Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.
Worker dormitories provided by the Suppliers or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

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2.8 Health and Safety Communication
Suppliers shall provide workers with appropriate workplace health and safety information and training in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

3. Environment

The Supplier shall control all of the environmental pollutants derived from its business activities and use its best efforts to reduce its environmental impact when providing products and services to SDPC. Suppliers shall adhere to laws and regulations related to chemical and waste management, recycling, wastewater and air emissions. If SDPC requests environmental requirements related to a process such as product design and production in any agreements or contracts, Suppliers shall adhere to such requirements.

3.1 Environmental Permits and Reporting
All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

3.2 Pollution Prevention and Resource Reduction
Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3.3 Hazardous Substances
Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Supplier shall comply with local laws and regulations prohibiting or controlling the use of particular chemicals and other materials.

3.4 Waste Water And Solid Waste
Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater from operational activities, industrial processes and sanitation facilities needs to be characterized, monitored, controlled and treated as required before discharge or disposal. In addition, measures should be taken to reduce wastewater generation. Suppliers should routinely monitor the performance of their wastewater treatment systems.

3.5 Air Emissions
Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge according to local laws and

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regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

3.6 Product Content Restrictions
Suppliers are to adhere to all applicable laws, regulations and SDPC requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.
In addition, Suppliers shall adhere to SDPC's product content restrictions management policy.

3.7 Water Management
The Supplier shall take a systematic approach to preventing storm water runoff pollution. Supplier shall prevent illicit discharges and spills from entering drains.

3.8 Energy Consumption and Greenhouse Gas Emissions
A company wide greenhouse gas reduction target should be established, and energy consumption and greenhouse gas emissions should be tracked, recorded, and publicly reported. Supplier should seek cost-effective ways to improve energy efficiency and minimize energy consumption and greenhouse gas emissions as much as possible.

4. Ethics
Suppliers are to adhere to all applicable laws and regulations in its business activities. SDPC requires Suppliers to uphold the highest standards of ethics.

4.1 Business Integrity
The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. Transparency should be ensured in all business transactions and should be accurately reflected in Suppliers' business accounts and records. Oversight and enhanced procedures should be put in place to ensure compliance with the requirements of anti-corruption laws.

4.2 No Improper Benefits
Bribes or other means of obtaining undue or improper benefits are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.
Improper benefits include but are not limited to:

1) Various gifts and nonmonetary forms of property, including but not limited to luxury goods, communication tools, transportation vehicles, houses, etc;
2) Cash or cash equivalents, "cash equivalents" refer to cards, coupons, discount coupons, or vouchers used to purchase goods or services, including but not limited to various types of vouchers, gift coupons, consumption coupons, shopping cards, prepaid cards, membership cards, etc;
3) Business entertainment, including but not limited to banquets, social activities, vacations, tourism, and consumption at commercial entertainment venues, such as karaoke bars, dance halls, nightclubs, saunas, massages, and golf;

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4) Provide any form of reimbursement, including but not limited to residential decoration, weddings and funerals, tourism, accommodation, shopping, tuition fees, overseas study visits, etc., or reimbursement of expenses that should be paid by myself and my close members.
5) Accepting and demanding kickbacks, or indirectly enjoying or squandering the money of relevant personnel or participating in gambling.
6) Business opportunities, including but not limited to engaging in or participating in business activities related to the company, introducing business, or using information obtained from the company during employment to disclose or use it for any commercial purpose.
7) Other behaviors that can be judged to be outside the normal scope of communication and affect the fairness of transactions based on the amount of property, social relationships, business knowledge, anti-corruption and bribery laws and regulations.

But when it belongs to normal social etiquette and is occasional without affecting specific rights and obligations, this restriction does not apply. For example:

1) For the purpose of necessary business etiquette, employees may accept or give gifts of low value (single item value less than RMB 200/ USD 30, or equivalent foreign currency) to Suppliers.
2) Principles of hospitality and business entertainment. Employees should adhere to the principles of nonrecurring, moderate, and serving legitimate and legitimate business purposes. They can only accept or provide business entertainment that is reasonable in cost and frequency, and in accordance with business practices. If the communicator is center level (including) or above, the standard amount of reimbursement of social expenses is 400 RMB/ person; If the communicator is below the center level, the standard amount of reimbursement for social expenses is 200 RMB/ person.

4.3 Disclosure of Information

All business dealings should be transparently performed and accurately reflected on Suppliers' business books and records. Information regarding Suppliers labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4.4 Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and the proprietary information of SDPC, Customers and Suppliers is to be safeguarded.

4.5 Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld.

4.6 Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality and protection of Supplier and employee whistleblower are to be maintained unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

4.7 Responsible Sourcing of Materials

In supply chain of SDPC, Suppliers, at any rate, shall not use minerals (such as tantalum, tungsten, tin, gold, etc.) and illegally timbered raw materials from any area, where it can cause serious human

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rights abuses and environmental destruction in the international community.
In addition, the exported materials in SDPC products to countries such as North Korea, Iran, Syria, Sudan, and Cuba, where weapons of mass destruction, conventional weapons, and missiles are likely to be manufactured, shall comply with the standards required by the international community, too. In this regard, Supplier shall develop a policy to ensure compliance with all relevant laws and regulations. Furthermore, Suppliers shall exercise due diligence on the source and chain of custody of these materials and make their due diligence measures available to SDPC upon SDPC's request. The obligation to provide relevant credentials shall be fulfilled when requested by SDPC.

4.8 Privacy
Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

5. Management System
The Supplier shall establish a management system to comply with the Code, applicable laws, regulations and other requirements of SDPC or its clients, that integrates human rights and labor, health & safety, environment and ethics issues into the business decision making process.
Such system shall include clear objectives and goals, regular monitoring, and continuous improvement actions.

5.1 Company Commitment
A corporate social and environmental responsibility policy statement affirming the Supplier's commitment to compliance and continual improvement, endorsed by executive management, must be announced to all facilities of the Supplier in the local language of each facility.

5.2 Management Accountability and Responsibility
The Supplier shall clearly identifies company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

5.3 Legal and Customer Requirements
The Supplier shall establish and continue to operate at all times a process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code and shall comply with the same.

5.4 Risk Assessment and Risk Management
The Supplier shall establish and continue to operate at all times a process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5.5 Improvement Objectives
Written performance objectives, targets and implementation plans to improve the Supplier's social and environmental performance, including a periodic assessment of supplier's performance in

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achieving those objectives.

5.6 Training
The Supplier shall establish and continue to operate at all times programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

5.7 Communication
The Supplier shall establish and continue to operate at all times a process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, Suppliers and customers.

5.8 Worker Feedback, Participation and Grievance
The Supplier shall establish and continue to operate at all times processes, including an effective grievance mechanism to assess employees' understanding of and obtain feedback on violations against practices and conditions covered by this Code and to foster continuous improvement.

5.9 Audits and Assessments
The Supplier shall establish and continue to operate at all times periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

5.10 Corrective Action Process
The Supplier shall establish and continue to operate at all times a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

5.11 Documentation and Records
The Supplier shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy. The Supplier’s adoption of and compliance with this Code must be documented, and relevant information must be promptly shared with SDPC upon its request.

5.12 Supply Chain Participation and Responsibilities
All Suppliers in business relationship with SDPC shall require, support, and monitor sub-suppliers' compliance with this Code. To that end, all Suppliers, where it is necessary to achieve the purpose of the Code, shall conduct due diligence on major sub-suppliers and manage improvement activities by referring to the RBA standards or the standards provided by SDPC to the extent that it does not violate the laws of the relevant country. Any violations of this Code within the supply chain may result in termination of Supplier's business relationship with SDPC.

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