

## Longshine Technology Group Co., Ltd.

## Anti-Commercial Bribery Policy

For the purpose of improving the management mechanisms of Longshine Technology Group Co., Ltd., maintaining fair competition in commercial activities, and ensuring that the Company's employees act with integrity, probity, and self-discipline in business interactions, this Policy is formulated in accordance with the Anti-Unfair Competition Law of the People's Republic of China, the Interim Provisions on the Prohibition of Commercial Bribery, and other relevant laws, regulations, and normative documents.

This Policy applies to Longshine Technology Group Co., Ltd. and all its subordinate departments, business units, branches, and controlled subsidiaries (hereinafter collectively referred to as "the Company" or "the Group"). All employees of the Company (including labor dispatch personnel and interns), directors, and supervisors shall strictly comply with the relevant laws, regulations, normative documents of the People's Republic of China, as well as the provisions and requirements of this Policy, engage in legitimate business dealings, and refrain from any form of commercial bribery.

## Main Content

- a. In commercial transactions, employees of the Company shall not use improper means to obtain business opportunities, commercial benefits, or any information or opportunity of actual value to the Company's operations. "Improper means" include, but are not limited to, methods that exceed the norms of normal business practices, such as:
  - (1) Giving or offering to give currency or monetary equivalents to relevant personnel;



- (2)Providing or offering to provide non-monetary assets (whether in the form of movable property, immovable property, or intangible assets) free of charge or at low cost to relevant personnel, including but not limited to giving or lending free of charge household appliances, vehicles, houses, securities (including stocks, bonds, etc.);
- (3) Providing or offering to provide any other special benefit to relevant personnel in any other way, including but not limited to property interests such as travel, entertainment, reimbursement of any form, debt relief, provision of loans and guarantees, entering into any profit-sharing agreement, as well as non-property interests such as honors, schooling opportunities, training, employment, and special opportunities.
- (4) Paying for services that are unnecessary or not performed, transacting with relevant personnel at prices significantly above fair market value, paying unnecessary market research remuneration, or paying unnecessary advertising fees or similar arrangements;
- (5) Distributing product samples beyond the reasonable needs of normal business or product promotion in exchange for favorable action towards the Company.

  For the avoidance of doubt, "relevant personnel" mentioned in this Policy includes, but is not limited to, government officials, clients, potential clients, suppliers, partners, their immediate relatives, and other stakeholders.
- b. Business entertainment, recreation, amusement, or other social activities with clients, potential clients, suppliers, or partners are permitted only if they meet all the following conditions:
  - (1) The purpose of the activity is to better promote understanding and develop closer business relationships;



- (2) The nature, frequency, and cost of the activity are reasonable and consistent with general business practices;
- (3) The activity complies with public order and good customs and does not take place in venues associated with gambling, pornography, drugs, etc.;
- (4) The activity is not perceived as a precondition or guarantee for future business;
- (5) The activity does not violate any applicable laws and regulations.
- c. When conducting social activities described in Article 4, the Company's financial reimbursement procedures must be followed. Expenses can be drawn or reimbursed only after approval by Company leaders at the corresponding level.
- d. If the Company needs to engage relevant individuals or institutions to supply products or provide services, such products or services must have commercial or technical importance and genuinely meet the Company's needs. The Company shall sign procurement contracts with such individuals or institutions. Furthermore, all the following requirements must be met:
  - (1) The products or services provided by the supplier are of commercial value to the Company upon reasonable judgment;
  - (2) The supplier provides actual products or performs real services, which are applied in the Company's operations;
  - (3) The quantity of products or services purchased is reasonable and the quality is qualified, adhering to the principle of meeting the Company's actual needs;
  - (4) The price for products or services must be comparable to the market price (if any) for similar products or services in the relevant region, without unreasonable significant



deviation;

- (5) Procurement contracts shall in principle be executed in writing and should, as far as possible based on the specific content of the procured products/services, clearly stipulate issues such as product/service specifications or types, delivery time, contract price and payment method, submission of results, quality assurance, and after-sales service.
- e. If the Company or its employees participate in tendering and bidding activities, the following requirements must be met:
  - (1) The purpose of the tendering and bidding activities shall be to meet the genuine operational needs of the Company;
  - (2) Tendering and bidding activities shall adhere to the principles of fairness, impartiality, and good faith;
  - (3) Compliance with the Tendering and Bidding Law of the People's Republic of China and relevant laws and regulations;
  - (4) Compliance with the Company's specific systems, regulations, and processes regarding tendering and bidding activities.
- f. Employees of the Company shall not violate the Company's financial systems, including but not limited to falsifying expenses or embezzling funds.
- g. Employees of the Company shall not accept or solicit personal benefits from partners, seek improper benefits for others, or use their position to influence the selection and evaluation of partners so that specific partners receive "special treatment" beyond normal commercial levels.



- h. Employees who violate this Policy and cause losses to the Company shall compensate the Company for all losses suffered thereby and accept disciplinary decisions made by the Company in accordance with the law and the Company's rules and regulations.
- i. This Policy is formulated and amended by the Company's Board of Directors in accordance with the provisions of relevant laws, regulations, and normative documents, and is subject to interpretation by the Board of Directors.