



# Anti-corruption policy

## Principle and position

Delton Technology has been adhering to the principle of integrity management and mutual benefit and win-win situation. Operating globally in compliance with national laws on fair competition, anti-bribery and anti-corruption, To promote integrity, fairness and justice of the code of conduct, and put it above business interests, Delton Technology holds a "zero tolerance" attitude towards any form of corruption and bribery, including any bribery made by all directors, management officers, employees and contractors (hereinafter collectively referred to as "relevant Personnel") or third parties who carry out work in the name of Delton Technology

The company strictly prohibits all forms of bribery, corruption, extortion, and embezzlement in its business operations. No individual associated with the Company or any third party acting on behalf of the Company shall directly or indirectly offer, promise, give, authorize to give or receive money or any other valuable item to a public official or any person affiliated with the Company for the purpose of improperly influencing their duties or conduct, or obtaining/maintaining any improper advantage in business activities. For further details regarding relevant policies, please refer to Delton Business Ethics Code of Conduct.

## Scope of application and description

This policy applies to all directors, officers and employees of the divisions and subsidiaries of Delton Technology as well as business partners.

Public officials are those who perform public functions in accordance with the law, including employees of governmental departments, individuals performing functions on behalf of governmental entities, personnel of State-owned enterprises or State-controlled companies, candidates of political parties and personnel of international organizations. When interacting public officials, careful consideration should be given to whether there is a violation of relevant applicable law, the integrity requirements for public officials and our anti-corruption policies.

## Policy requirements



- All employees of high-risk positions within Delton Technology are required to sign relevant agreements and letter of integrity commitment.
- The Company requires all employees and business partners to comply with applicable anti-corruption and anti-bribery laws and regulations, as well as the relevant policies, codes, and procedures issued by the Company.
- The Company expects all employees and business partners to possess a comprehensive understanding of the application of anti-corruption and anti-bribery laws and regulations in their respective roles, actively engage in rigorous anti-corruption compliance training, effectively seek guidance on compliance matters or promptly report potential violations, and ensure the veracity, accuracy, and completeness of records, data, and information throughout the business process. The aforementioned information shall be meticulously documented and securely stored.
- The Company requires third party personnel (including service providers, suppliers, consultants, and other partners) to comply with the Company's Supplier Code of Conduct, Integrity commitment requirements and this Policy. The Company strictly prohibits any form of bribery by or in collaboration with third parties and expects them to abstain from engaging in bribery and corruption activities. This includes refraining from offering gifts or hospitality that do not align with business practices while representing or working with the company.

#### **(1) Regarding gifts and hospitality**

Under any circumstances , our employee shall not directly or indirectly offer gifts or hospitality to public officials, customers, or partners with the intent of engaging in corrupt practices. Requests for gifts or hospitality from partner personnel are also strictly prohibited. Prior to offering or accepting gifts and hospitality, employees must bear in mind that the Company strictly prohibits any form of corruption and should assess whether such actions may have a detrimental impact on the Company's reputation.

Consider the following before offering or accepting gifts and entertainment:



- The purpose of the business relationship should be to establish and maintain positive connections. It should not be to gain unfair advantages or influence normal business processes or decisions.
- Timing is important and should be considered. Avoid making decisions during sensitive periods such as the bidding process or important decision-making stages that may affect fair decision-making.
- Reasonable value: It is normal business practice to avoid offering or accepting gifts, cash or cash equivalents, or other prohibited types of gifts that exceed normal value.
- Legal compliance: Business gifts and hospitality should be transparent and in accordance with local laws and anti-corruption provisions of the other party.
- For detailed guidance on offering and receiving gifts and hospitality, please consult the Expense Reimbursement Management System and the Code of Business Ethics Management.

## **(2) On Charity and Giving**

Delton Technology is committed to not solely pursuing its own interests but pay attention to the importance of social responsibility.

Delton Technology prohibits the use of charity and donations to conceal corrupt activities and requires effective measures to ensure the transparency and legality of such activities.

## **Records**

We are committed to supporting business decisions by providing appropriate documentation in an honest and transparent manner and filing as required

Delton Technology requires that accurate and complete financial records be maintained for all asset disposals and expenditures in accordance with the document preservation policy for verification.

## **Report**

All employees and partners who encounter issues related to anti-corruption compliance can report them to the Group Audit Department either in their real name or anonymously.



They will not face any retaliation under any circumstances for reporting actual violations in good faith.

Group General Manager *Ruby Zeng.*