昆山龙腾光电股份有限公司

InfoVision Optoelectronics (Kunshan) Co., LTD.

Business Ethics Policy and Implementation Guidelines

The company adheres to the concept of "integrity-based". Ensure the observance of highest integrity standards in all business transactions.

We have a zero-tolerance policy for all forms of corruption, bribery, corruption, extortion, and misappropriation of public funds. In the event of a violation, either severe disciplinary action or further legal action will be taken.

Business Ethics Policy

- 1. All employees engaged in business related to the company shall not infringe upon the rights and interests of the company due to conflicts of their own interests.
- 2. It is not allowed to promise, provide, grant, give or accept bribes or other forms of benefits provided to obtain illegal or improper advantages.
- 3. Comply with relevant international conventions and Chinese laws and regulations on intellectual property protection, and protect the intellectual property of the company and others.
- 4. We promise to abide by the competition laws, fair trade laws, and anti-monopoly laws of various countries, ensure the sustainable and

- healthy development of the company, and maintain market competition order.
- 5. Anyone who informs the company and its stakeholders in good faith that there is a clear violation of business ethics policies or relevant regulations will not be subject to any form of retaliation or threat.
- 6. Without personal consent (or default under local law), personnel (including customers, suppliers, employees, and other stakeholders) information shall not be collected, stored, processed, transmitted, or shared.
- 7. Disclose information on labor, health and safety, environment, business activities, organizational structure, financial status, and performance in accordance with relevant regulations and current industry practices
- 8. Adhere to responsible mineral procurement, prohibit the use of conflict minerals, and ensure the compliance of raw material sources.

Management and Execution

- 1. Company has established management measures such as the "Sustainable Procurement Policy Requirements", "RBA Business Ethics Management Standards", "Intellectual Property Protection Standards", and "Employee Code of Conduct", which list the behaviors that employees of the company should abide by. We require strict adherence to the company's business ethics standards when engaging in daily work and business to maintain the company's reputation.
- 2. zA commitment letter has been established for suppliers, which includes not using conflict minerals, adhering to RBA code of conduct, and ensuring supplier integrity and integrity. Suppliers are required to sign and strictly comply with relevant guidelines.
- 3. All company employees should remain vigilant against any violations of business ethics. When there are doubts or any violations of business ethics are found, it is the responsibility to report to the supervisor.
- 4. Whether you are a supplier, customer, company employee, or other interested party, if you believe that IVO employees have doubts about violating business ethics, you can call (0512-5727888-18980) or email (audit@ivo.com.cn or ltdmb@ivo.com.cn) Provide opinions or

report illegal situations. Upon receiving the report, the relevant responsible department will immediately investigate and promptly follow up and handle various types of reported information and incidents. The company will continue to improve its business ethics standards, facilitate reporting channels, and increase investigation efforts.

5. Company promises that the whistleblower will not be subjected to any form of retaliation or threat, and the relevant content of the report will be kept confidential.

Annual execution results

Please refer to the annual ESG report disclosed on the IVO official website/Sustainable Development/Enterprise Sustainable Development page.

IVO advocates that employees should always prioritize integrity, protect trade secrets, pursue fair competition, respect intellectual property rights, safeguard consumer rights, and assume social responsibility; At the same time, strengthen the promotion and guidance of business ethics, provide employees with ethical standards and training, create a good business ethics atmosphere, and jointly promote the sustainable development of the enterprise.