

Ninestar Corporation

Anti-Bribery and Anti-Corruption Management Policy

Article 1: Purpose

Ninestar Corporation (hereinafter referred to as "the Company" or "Ninestar") adheres to the core values of loyalty, pragmatism, innovation, and win-win. It complies with laws and regulations, insists on honest operations, and upholds business ethics. To further standardize the value guidance and behavior norms in practicing compliant operations, business ethics, and social responsibility, the "Ninestar Anti-Bribery and Anti-Corruption Management policy" is formulated as a standard and guideline.

Article 2: Objective

To regulate the professional behavior of all employees, especially directors, supervisors, middle and senior management, and key position employees, and to establish a work style of integrity, diligence, and dedication. Employees must comply with relevant laws and regulations, professional ethics, and the Company's internal management policy to prevent actions that harm the interests of the Company and its shareholders.

Article 3: Scope

This policy applies to all employees of Ninestar and its subsidiaries and branches. Employees of affiliated companies should refer to this policy for implementation.

Article 4: Definitions and Content

Corrupt behavior includes bribery, corruption, and fraud that harm the legitimate economic interests of the Company and seek improper economic benefits for the Company.

1. Actions that harm the legitimate economic interests of the Company:

- Internal and external personnel using illegal or non-compliant means such as concealment and deception to seek personal improper benefits, thereby harming the legitimate economic interests of the Company.

2. Bribery, corruption, and fraud that seek improper economic benefits for the Company:

- Actions that seek improper economic benefits for the Company, which may also bring improper benefits to individuals or others.

Article 5: Responsibilities

1. Board of Directors:

- Responsible for urging management to establish an anti-bribery, anti-corruption, and anti-fraud culture within the Company and to establish and improve an internal control policy that includes fraud prevention. The Audit Committee of the Board of Directors is the leading body for the Company's anti-bribery, anti-corruption, and anti-fraud work, guiding and supervising these efforts.

2. Management:

- Responsible for establishing, improving, and effectively implementing internal controls to reduce the occurrence of bribery, corruption, and fraud, and taking appropriate and effective remedial measures against such behaviors, under the supervision of the Audit Committee and the Board of Directors.

3. Human Resources and Audit Departments:

- These departments are the permanent bodies for the Company's anti-bribery, anti-corruption, and anti-fraud work, responsible for implementing these efforts within the Company and its subsidiaries. Specific responsibilities include:

- Handling and registering reports of bribery, corruption, and fraud.
- Organizing investigations into bribery, corruption, and fraud cases.
- Proposing handling opinions and accountability for bribery, corruption, and fraud cases.
- Other anti-bribery, anti-corruption, and anti-fraud work, such as building a culture of integrity, training, and education.

4. Business Units/Branches and Department Heads:

- Responsible for managing the occurrence of bribery, corruption, and fraud within their units/departments and are the first persons responsible for anti-bribery, anti-corruption, and anti-fraud efforts.

5. All Employees and Business Partners:

- Must strictly adhere to the code of conduct for integrity and self-discipline. If any suspected or actual violations of this policy are found, they should report to their department head or the Human Resources Department.

Article 6: Related Requirements

1. Ninestar adopts a "zero tolerance" attitude towards bribery and corruption. Employees must adhere to principles of integrity and law-abiding, comply with anti-commercial bribery and anti-embezzlement laws and regulations, and internal Company rules. They must not accept bribes, offer bribes, or introduce bribes, nor use their positions to embezzle Company property or misappropriate public funds.

2. Under no circumstances should employees offer or accept gifts or hospitality with the intent of corruption. Employees must evaluate whether such actions will adversely affect Ninestar's reputation and ensure the legitimacy, reasonableness, and compliance of the purpose and value of gifts and hospitality.
3. Employees must avoid any events that may involve or have already involved conflicts of interest between personal and Company interests.
4. Employees are prohibited from participating in any transactions that directly or indirectly benefit themselves or their family members.
5. When conducting business with partners where there is a personal or specific relationship, employees must proactively declare their relationship and detailed business situation in writing to their superior.
6. Employees must not use Company property, directories, information, or positions to seek personal benefits.

Article 7: Reporting and Whistleblower Protection

1. To create a culture of integrity, Ninestar encourages real-name reporting of violations of this policy and suspected violations of integrity and self-discipline. Whistleblowers will be rewarded after the Human Resources Department files the case, with specific reward rules to be stipulated separately.
2. Employees who discover violations or suspected violations of the code of conduct or internal Company rules should report to their department head or the Human Resources Department. Employees who report violations in good faith will not face disciplinary action, but false reports are prohibited.

3. The Company will protect the personal information of whistleblowers to prevent defamation and retaliation. The names, companies, departments, positions, and contact information of whistleblowers will only be used for investigation or notification purposes and must not be disclosed to the accused.
4. Anti-bribery, anti-corruption, and anti-fraud staff must be loyal to their duties, keep secrets, and take strict confidentiality measures to protect the legal rights of whistleblowers.
5. The Company has the right to dismiss or terminate the employment contract of anyone who leaks whistleblower information or retaliates against whistleblowers. Legal violations will be referred to judicial authorities for handling.

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