

Ninestar Corporation

CODE OF CONDUCT

1. Introduction

Founded in 2000, Ninestar Corporation has been focusing on the printing and imaging industry for over 20 years. As one of the top 500 listed companies in China, it has now become the world's fourth largest laser printer manufacturer, with a market cap of more than 70 billion RMB (As of June 2022) and annual revenue of more than 20 billion RMB. Ninestar has been listed on the Shenzhen Stock Exchange (stock code: 002180) since 2014. Ninestar has achieved full coverage of printing industry chain, and runs its business in more than 150 countries and regions around the world with a series of well-known brands across a variety of industry segments, including "Lexmark" "PANTUM" "APEXMIC" "G&G" and "Static Control". Ninestar hires more than 23,000 employees worldwide, of which 20% are R&D staffs. Its technological products include laser printers and consumables, integrated circuit chips, printer core components, etc. It owns 4,885 independent R&D patents, 3,378 of which are invention patents. Ninestar abides by local laws and regulations in all business premises and industry sectors, pays attention to the impact of business ethics on itself and all stakeholders, and formulates this system in accordance with the Universal Declaration of Human Rights, OECD Guidelines, ILO standards, etc. Ninestar adopts a "zero-tolerance" policy towards business ethics violations and formulates a number of management rules, rewards, and punishments to strictly manage the violations. In order to continuously strengthen the awareness of business ethics throughout the Company and consolidate compliance achievements, Ninestar will regularly train all relevant personnel on relevant policies and systems, and make proper training records and appraisals.

2. Scope

The Policy is applicable to all relevant personnel of Ninestar, including regular employees, dispatched laborers, interns, temporary and part-time employees who have signed employment contracts, and members of the Board of Directors, covering Ninestar's global operation sites and subsidiaries and branches, as well as industrial facilities directly or indirectly controlled or operated by Ninestar in the world. Ninestar is committed to exert influence over joint ventures not controlled by the Company and urge them to act in accordance with the provisions of the Policy. In addition, Ninestar encourages suppliers and partners to recognize and abide by the relevant provisions of the Policy.

3. Policy Commitments

3.1 Compliance with laws and regulations

Ninestar is committed to ensuring a high level of compliance. We strictly abide by the provisions and essence of all current laws and regulations of the People's Republic of China, fulfill our corporate responsibilities and obligations in strict accordance with the policy requirements issued by regulators, and strictly implement the ethical standards advocated and encouraged by current laws and regulations. For all overseas operational businesses of Ninestar, we promise to strictly abide by the laws and regulations issued by the country and the local government and cooperate with the investigation and inspection of all regulators. When conducting business in any jurisdiction, relevant personnel must abide by the laws of their own country's jurisdiction as well as the laws and regulations of the jurisdiction where they are located, develop globally with highly compliant corporate behavior, and fulfill corporate responsibilities.

3.2 Anti-corruption and anti-fraud

Ninestar has zero tolerance for corruption and fraud. If corruption and fraud are found, relevant personnel will be strictly punished and handed over to the judicial authorities for trial. All employees, senior management, and members of the Board of Directors (hereinafter collectively referred to as "relevant personnel") are required to abide by the relevant regulations of Ninestar on anti-corruption and anti-fraud. The code of conduct required by Ninestar to be followed by employees is set forth here for supervision and reporting by relevant persons inside and outside the Company.

- Under no circumstances shall relevant personnel offer benefits (other than a publicity or promotional gift of merely symbolic value) to any person or company having business dealings with Ninestar, so as to influence such person or company in business dealings;
- Relevant personnel shall not accept or offer benefits through means including charitable donations, sponsorship, agency, consultation, joint venture, undertaking, or guarantee; Relevant personnel shall not intentionally conceal or misreport the business contents; shall not interfere with or mislead the Company's decisions through false information; shall not disclose the Company's trade secrets for commercial interests;
- It is strictly prohibited to offer benefits to any government official as a way to obtain business or benefits for Ninestar, and any form of facilitation payment is also prohibited. Relevant personnel shall not directly offer prohibited benefits through their own personal

participation, or indirectly offer such benefits, such as authorizing or allowing a third party to offer prohibited benefits on behalf of Ninestar;

- Neglect of duty, abuse of power and position, favoritism and fraud, false increase of performance, fictitious profits, tax evasion, and ultra vires decision-making and approval are prohibited.

3.3 Anti-conflict of interest

A conflict of interest is considered to exist by Ninestar when an individual's obligations to the Company conflict with his or her personal interests. In principle, we reject conflicts of interest in any situation, and employees, senior management and members of the Board of Directors (hereinafter collectively referred to as "relevant personnel") must avoid conflicts of interest that they create. When employees have conflicts of interest, they can avoid or reduce the interests of Ninestar and relevant personnel through timely reporting and handling. Ninestar believes that conflicts of interest may include:

- External work and associated relationships with suppliers, customers, competitors, or government agencies;
- Management or supervision of relatives and friends;
- Existence of an intimate relationship with another employee and you can influence decisions relating to that employee's (salary, performance rating, or promotion);

- Gifts given or received as a result of employment with Ninestar.

3.4 Fair competition and anti-monopoly

Ninestar believes that fair, just, and open competition can bring maximum benefits to customers, partners, and society. Ninestar abides by anti-monopoly laws and regulations, strictly reviews all business, and discloses information according to standards. Ninestar has established effective monitoring and implementation mechanisms to ensure the compliance of all business operations of the Company at home and abroad, strengthened the prevention and control of common risks of legal compliance of the Group, and effectively supervised all departments to improve internal control measures and long-term mechanism of risk control. Ninestar strictly manages the transaction amount, discloses the amount according to compliance requirements, and ensures that relevant donations and support behaviors do not undermine the fairness of business competition. Ninestar has formulated relevant regulations to review the legality and compliance of all business transactions through fair and impartial evaluation, and promises not to establish monopoly combines or cartels with large-scale competitors in the market, or use predatory pricing as a strategy due to its large market share to reduce fair competition in the market and violate relevant anti-monopoly laws and regulations.

3.5 Anti-money laundering and insider trading management

Ninestar strictly abides by the laws and regulations related to anti-money laundering and insider trading compliance involved in all businesses and establishes a sound compliance management system for anti-money laundering and insider trading, of which the management

scope covers all business activities and management processes of Ninestar and is incorporated into the Company's risk management system. Ninestar has zero tolerance for money laundering and insider trading and requires all controlled entities, employees, senior management, members of the Board of Directors, suppliers, and contractors not to engage in money laundering or insider trading. Once found, the relevant personnel will be dealt with severely.

3.6 Political contributions and activities

Ninestar encourages employees, senior management, and members of the Board of Directors (hereinafter collectively referred to as "relevant personnel") to participate in political events with developmental and positive significance in a legal, compliant, and effective manner. However, when participating in political activities, relevant personnel must make use of their own time and resources, and be clear that their own actions and political views have no connections with Ninestar. Ninestar acknowledges that the formulation of public policies can greatly affect the Company's operations and future business opportunities. But we do not interfere with public policies. Ninestar reserves the right to communicate and cooperate with the Central Government and governments at all levels and will actively cooperate with the work of governments at all levels and get a general picture of the direction and significance of government policies. Ninestar will also authorize designated employees to engage with government officials to carry out business cooperation and exchanges and understand government planning, so as to make appropriate internal decisions on business development. Ninestar's contacts and activities with governments at all levels are subject to the regulation or supervision of all governments, media, and the public. Ninestar promises not to donate its

funds to public offices, political parties, or committees established to fund candidates. Ninestar does not contribute to non-party voters in registration, education, and voter turnout programs.

3.7 Diversity and inclusion

Ninestar respects human rights and is fully aware that diversity enriches our workplace. We are committed to creating a diverse and equitable work environment for all employees and an inclusive culture that does not discriminate against individuals on the basis of race, skin color, age, nationality, religion, sexual orientation, gender identity and expression, marital status, family status, disability or any other legally protected factor. All employees must abide by the principle of mutual respect at work, and we have zero tolerance for discrimination or any other form of violation or misconduct against any individual or group. In the recruitment and promotion process, we provide equal opportunities, take ability, performance, and seniority as considerations, and do not bias and discriminate on the basis of age and gender.

3.8 Anti-harassment

Ninestar is committed to creating a healthy, safe, and harmonious work environment for all employees. Ninestar prohibits anyone from harassing employees in any form, including but not limited to insulting noise, facial expressions, vulgar language and gestures, making nicknames, slander, derogatory comments, threats, hostile behavior and touching. Sexual harassment is one of the prohibited forms of harassment. Sexual harassment shall not be committed against the will of others whether the harassment is conducted verbally, practically, or through the internet, by means of spoken and written language, images, or physical acts. Any employee who commits harassment violating our policy will be subject to disciplinary punishment or even

dismissal. Moreover, where supplier representatives, independent contractors, or visitors are found to have harassed our employees, in that case, we will require them to leave Ninestar's premises and prevent them from dealing with Ninestar's employees in the future. Retaliation against employees who report harassment in good faith or assist in investigating harassment complaints is prohibited.

3.9 Intellectual property protection

Ninestar focuses on protecting its own intellectual property rights while not infringing the intellectual property rights of others during actual business operations. The Company strictly prohibits employees from improperly obtaining, disclosing, using, and disposing of other people's trade secrets. Ninestar complies with all applicable license terms when using the intellectual property rights of others. The Company integrates protection requirements regarding intellectual property rights into business processes such as product R&D, sales, and procurement, regularly reviews and continuously improves in combination with problems and cases existing in business operations, and carries out publicity and training on intellectual property rights and trade secret protection to all employees so that employees are fully aware of the obligations and responsibilities of compliance of intellectual property rights. When encountering problems involving intellectual property rights, the Company will conduct relevant investigations to ensure that its own and other people's intellectual property rights are protected and respected.

3.10 Information and privacy protection

The protection of personal information plays an important role in our digitized world. Ninestar respects the personal information of employees, distributors, suppliers, customers, and investors, and abides by all applicable laws regarding the protection of their personal financial information, medical information, and information confidentiality. We handle such information seriously and responsibly, respecting everyone's privacy. The Company establishes an emergency plan for information security incidents, and timely informs customers of the basic situation and possible impact, disposal measures taken or to be taken, suggestions for customers to independently prevent and reduce risks, remedial measures for customers, etc. in case of information security emergencies.

3.11 Environmental protection

We regard environmental protection as one of the Group's important responsibilities and implement the concept of environmental protection throughout all operational activities. This requires us to actively advocate for and take advantage of various opportunities to enhance the efficient use of energy and resources, reduce emissions of harmful pollutants and ensure that all waste is disposed of in a safe and responsible manner. The Company actively fulfills its environmental protection obligations, reviews and considers the impact of its own activities on the environment, and ensures that the activities within the Group's production and operation comply with reasonable environmental protection codes. The Company also plans and conducts business in a way as to minimize the adverse impact on the environment during the life cycle of each project, maintains the surrounding environment in daily operation, and avoids or reduces the adverse impact due to production and operational activities on the environment, and minimizes the negative impact of the business on the environment.

3.12 Healthy and safe workplace

Ninestar is committed to providing employees with a safe and healthy work environment and minimizing the negative health and safety impacts caused by business operations. Ninestar abides by relevant laws and regulations regarding occupational safety and health, furnishes all employees with mechanical and physical facilities required for personal safety and health, provides education and training required for employees to identify risks, eliminate dangers and work safety, and reasonably eliminates known potential safety hazards and takes appropriate measures to prevent potential safety hazards. It is the responsibility of every employee to abide by environmental, safety, and health rules and practices to maintain a safe and healthy work environment for other employees. Every employee shall report accidents, injuries, and unsafe equipment, practices, or circumstances, take measures to supervise health and safety performance. It is the responsibility of every employee to perform his or her duties in a safe manner and not drink alcohol, use drugs, or take in other prohibited substances. The use of drugs or other prohibited substances in the workplace is prohibited. Any form of violence or threat of violence is prohibited.

4. Reporting Management

Ninestar encourages all employees, members of the Board of Directors, and stakeholders to report favoritism and fraud, and actions that are detrimental to the interests of the Company in real name or anonymously. The Company has established a complaint and reporting mechanism, which provides online and offline reporting channels, including telephone, email, QR code, mailbox, and face-to-face reporting. The Company reads and registers the reporting letters and written materials submitted piece by piece, listens to the face-to-face reporting

respectively and separately and registers the reporting in detail, and investigates and handles the reporting timely. The Company resolutely protects the information security of informants, implements the informant protection policy, strives to keep the information of informants confidential, and never allows any infringement and retaliation against informants. Once verified, such actions will be dealt with seriously according to relevant regulations.

5. Supervision and Review

Ninestar strictly abides by the *Company Law of the People's Republic of China*, the *Securities Law of the People's Republic of China*, and other laws and regulations and formulated the *Supervision and Management System* and other policies. The Auditing & Supervision department of the Company assists the Management in organizing the identification, assessment, and monitoring of fraud risks, properly implements the Company's publicity on anti-fraud policies, establishes reporting channels, standardizes reporting procedures, accepts reports and complaints about fraud, records, investigates and briefs reported violations of discipline and regulations, follows up subsequent handling, and regularly reports the anti-fraud work to the Audit Committee and the Board of Directors and listen to their guidance opinions. The Auditing & Supervision department of the Company is also responsible for the establishment, improvement, and effective implementation of the internal control system, and carries out inspection and supervision. The Auditing & Supervision department evaluates the authenticity and integrity of the Company's financial information, as well as the efficiency and effect of operational activities. In view of the identified risks, Ninestar urges all departments to carry out internal control improvement in a timely manner to prevent the occurrence of various risk events.

6. Policy Review and Revision

The Policy was approved by the Board of Directors on January 1, 2023 and was implemented from January 1, 2023. The contents of the Policy will be reviewed or updated according to the needs of the Company, or, at least every three years.

Ninestar Corporation

Date: Jan 2023

Ninestar