

Code of Conduct for Supplier's Social Responsibility

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Code of Conduct

Zhejiang Dahua Technology Co., Ltd. is a globally leading provider in video-centric smart IoT (Internet of Things) solutions and operational services. Committed to the mission of "Making Society Safer and Life Smarter", Dahua delivers end - to - end security solutions, systems, and services, creating value for urban operations, corporate management, and consumer lifestyles. As a proud and responsible global corporation, Zhejiang Dahua Technology Co., Ltd., along with its subsidiaries, and consolidated affiliates (hereinafter referred to as "the Company" or "Dahua" or "we") are committed to their business with integrity and fairness while respecting laws, our values, and corporate policies. We seek suppliers who share the same principles. A supplier to Dahua is expected to adhere to the Code of Conduct for Supplier's Social Responsibility (hereinafter referred to as the "Code").

We require suppliers to run their business in alignment with the principles and requirements outlined in this Code of Conduct (if applicable) and fully comply with all applicable laws and regulations. Dahua reserves the right to conduct on - site audits at suppliers' premises to assess their compliance with this Code. Any violation of this Code may jeopardize the business relationship between the supplier and Dahua. In the most severe cases, it may result in termination of the business relationship between the two parties.

This Code is formulated based on the "Code of Conduct" (RBA Code of Conduct, hereinafter referred to as the "Code of Conduct". For detailed information, please visit the website: <http://www.responsiblebusiness.org/code-of-conduct>) issued by the Responsible Business Alliance (RBA, formerly the Electronic Industry Citizenship Coalition (EICC)), combined with the requirements of the "Supply Chain Sustainability Guide" (hereinafter referred to as the "Guide". For detailed information, please visit the website: <http://jac-initiative.com/resources/>) issued by the Joint Audit Cooperation in the global telecommunications industry. This Code aims to establish and ensure a safe working environment in the supply chains of the electronics and ICT industries, ensure that workers are respected and treated with dignity, and that enterprises assume environmental responsibilities and abide by ethical norms in their operations.

Suppliers acknowledge that this Code applies to all suppliers and subcontractors (collectively referred to as "Suppliers") that provide products or services to Dahua and/or its subsidiaries and affiliated companies worldwide. This Code will not override national laws, nor will it provide any rights not covered by national laws and regulations.

The implementation of this Code shall be based on the clear understanding that all business activities must fully comply with the laws and regulations of the country/region where the business is operated. Suppliers shall be encouraged to refer to internationally recognized standards in addition to complying with regulations, so as to promote corporate social and environmental responsibilities and compliance with business ethics.

Suppliers shall recognize this Code, support the basic codes of the Code of Conduct and the

Guide, and deploy and implement the requirements of the Code of Conduct and the Guide in their respective organizations. In addition, Suppliers shall make their downstream suppliers aware of and implement the code of corporate social responsibilities ("CSR") required by the Code of Conduct and the Guide, and finally make it run through the whole supply chain.

Suppliers acknowledge that, upon reasonable notice, Dahua reserves the right to conduct inspections on the Suppliers' implementation of CSR.

1. Labor Standards

Suppliers promises to safeguard the human rights of employees and give them dignity and respect in accordance with internationally recognized regulations. Such regulations apply to all employees, including temporary workers, immigrants, apprentices, contract workers, direct employees and any other types of employees.

1.1 Free Choice of Employment

No laborers who are forced, mortgaged (including bonded labor) or bound by contracts, involuntary prison laborers, slaves or trafficked persons shall be employed, including not transporting, harboring, recruiting, transferring or receiving such labor or services by threats, coercion, coercion, abduction or deception.

In addition to prohibiting unreasonable restrictions on entering and leaving the workplace, no unreasonable restrictions shall be imposed on employees' freedom of movement within the workplace.

As part of the recruitment process, employees must be provided with a written employment agreement written in their native language before leaving their country/region, which should include a description of the terms and conditions of employment. Employees shall receive the employment agreement before leaving their home country, and the employment agreement shall not be replaced or changed after they arrive in the host country, unless such changes are made to comply with local laws and provide equal or better terms and conditions.

All work must be voluntary, and employees shall be free to leave their jobs or terminate their employment at any time.

As employers, suppliers and agents shall not retain or otherwise damage, conceal, confiscate the identity or immigration documents of employees or refuse employees to see their identity or immigration documents, such as government-issued identity certificates, passports or work permits, unless the work permit must be retained as required by law.

Employees shall not be required to pay recruitment fees or other charges. As an employer, the supplier must disclose any fees charged to the employees, and the amount exceeding one month's salary must be returned to the employees.

1.2 Child Labor and Underage Workers

Child labor shall not be used at any stage of manufacturing.

"Child" refers to anyone under the age of sixteen (16), below the age of completing compulsory education or below the minimum age for employment in a country/region, whichever is the highest.

Suppliers should implement appropriate mechanisms to verify the age of workers.

Support the adoption of legal workplace apprenticeship programs that comply with all laws

and regulations. Employees under the age of eighteen (18) (underage workers) are not allowed to engage in work that may endanger health or safety, including night shifts and overtime. Suppliers shall reasonably maintain the records of student workers, conduct strict due diligence on tutors and partners, and protect the rights of student workers in accordance with applicable laws and regulations to ensure proper management of student workers. Suppliers shall provide appropriate support and training for all student workers. In the absence of local legal provisions, the wage rate of student workers, interns and apprentices shall be at least equal to that of other junior employees who perform the same or similar positions.

If child labor is found, the supplier should provide assistance/remedies.

1.3 Working Hours

Business practice research shows that excessive employee pressure is obviously related to the decline of productivity, the increase of staff turnover and an increase in the number of sick and injured employees. The weekly working hours shall not exceed the maximum limit stipulated by local laws. Meanwhile, unless in case of emergency or exceptional circumstances, the working hours in a week, including overtime, shall not exceed sixty (60) hours. Employees shall have at least one (1) day off every seven (7) days.

1.4 Wages and Benefits

The remuneration paid to employees shall comply with all applicable wage laws, including laws on minimum salary, overtime hours and statutory benefits.

According to local laws, employees' overtime pay shall be higher than the normal hourly wage.

It is forbidden to deduct wages as a means of disciplinary action.

In each payroll cycle, employees shall be provided with a clear and easy-to-understand payslip in a timely manner, with sufficient information to confirm the accurate remuneration they deserve for their work.

Temporary workers, dispatched employees, and outsourced laborers shall be employed in accordance with the restrictions and regulations of local laws.

1.5 Humane Treatment

Disciplinary policies and procedures shall be clearly defined and communicated to employees. No harsh and inhumane treatments such as sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal insult shall not be imposed on employees; nor shall there be threat to commit such acts. Disciplinary policies and procedures supporting these requirements shall be clearly defined and communicated to employees.

1.6 Non - discrimination

Suppliers shall promise to ensure that employees are free from harassment and illegal discrimination. It is not allowed to discriminate against employees in employment or recruitment such as salary, promotion, reward and training opportunities because of race, color, age, sex, sexual orientation, gender identity and gender expression, race or nationality, disability, pregnancy, religious belief, political affiliation, membership of a community, protected veteran status, protected genetic information or marital status. Reasonable arrangements for religious activities shall be provided to employees. In addition, employees or prospective employees shall not be required to undergo medical tests or physical examinations that may have discriminatory purposes.

1.7 Freedom of Association

In accordance with the requirements of local laws, suppliers shall respect the rights of all employees to freedom of association, to join trade unions, to engage in collective bargaining, and to participate in peaceful assemblies, and also respect the rights of employees not to participate in such activities. Employees and/or their representatives shall be able to communicate openly with the management and share suggestions and opinions regarding the work environment and management practices without fear of discrimination, retaliation, threats, or harassment.

2. Health and Safety Requirements

Suppliers shall understand that in addition to minimizing work-related injuries and accidents, establishing a safe and healthy work environment can improve the quality of products and services, which is conducive to promoting production, improving employee retention, and boosting employee morale. Suppliers shall also understand that continuous employee engagement and education are essential to discover and solve health and safety problems in the workplace.

Suppliers shall be encouraged to implement a health and safety management system based on ISO 45001 international standards, which at least include the following requirements:

- (1) Conduct and continuously carry out comprehensive risk assessments;
- (2) Formulate appropriate implementation plans to reduce risks;
- (3) Develop a health and safety plan, implement it, and follow up on the completion of the plan;
- (4) Establish appropriate systems and processes to monitor any non-compliance;
- (5) Appoint senior management representatives to ensure a safe and healthy working environment for all employees and implement the above health and safety requirements.

The health and safety standards can be summed up as follows:

2.1 Occupational Safety

Suppliers shall control potential safety hazards that employees may encounter (such as electrical and other energy sources, fire, vehicles, and fall hazards) through proper design, engineering and management controls, preventive maintenance, and safe workflow (including locking/tagging), as well as continuous safety training. If the hazards cannot be effectively controlled through the above methods, suppliers shall provide employees with appropriate and well-maintained personal protective equipment and educational materials on the risks that may be caused by the above hazards. Employees shall be encouraged to raise safety concerns.

In addition, suppliers must take reasonable measures to keep pregnant women/lactating mothers away from high-risk working conditions, eliminate or reduce workplace health and safety risks (including those related to their work tasks) for pregnant women and lactating mothers, and provide reasonable facilities for lactating mothers.

2.2 Emergency Preparedness

Suppliers shall identify and evaluate emergencies and incidents and minimize their impact by implementing emergency response plans and procedures, including: emergency reporting, employee notification and evacuation procedures, employee training and drills, appropriate fire detection and extinguishing equipment, adequate exit facilities, and recovery plans. Such plans and procedures shall minimize harm to personnel, the environment, and property as much as

possible. Emergency drills must be conducted at least once a year or as required by local laws, whichever is more stringent.

2.3 Work-related Injuries and Diseases

Suppliers shall establish procedures and systems to prevent, manage, track, and report work-related injuries and diseases, including the following provisions: encourage employees to report; classify and record the cases of work-related injury and disease; provide necessary medical services; investigate cases and take corrective actions to eliminate the impact; assist employees in returning to work.

2.4 Industrial Hygiene

Suppliers shall provide employees with a healthy workplace and shall identify, evaluate, and control the impact on employees caused by chemical, biological, and physical reagents. Engineering or management measures must be taken to control excessive exposure to hazard sources. When the hazard sources cannot be effectively controlled through these methods, employees' health must be protected through appropriate personal protective equipment program. The protection plan should be carried out continuously, and training related to these hazards should be provided.

2.5 Heavy Physical Work

Suppliers shall identify, evaluate, and control the impact on employees engaged in heavy physical work, including manual handling of materials, repeated lifting of heavy objects, long periods of standing, highly repetitive or strenuous assembly work.

2.6 Machine Protection

Suppliers shall evaluate the safety hazards on production equipment and other machinery. Physical protection devices, interlocking devices, and barriers shall be provided for machinery that may cause injuries to employees and they should be properly maintained.

2.7 Public Health, Diet, and Accommodation

(1) Suppliers shall provide employees with clean toilet facilities, drinking water, and clean food preparation, storage, and dining facilities. Employee dormitories provided by suppliers or labor agencies shall be kept clean and safe, and appropriate emergency exits, hot bath water, adequate heating and ventilation, and reasonable private space with convenient access should be provided.

(2) Suppliers shall formulate emergency plans for hierarchical response to epidemic situation of infectious diseases and other public health events, and conduct simulation drills on a regular basis, so as to find problems in time and improve them in time. Protective supplies (such as masks, gloves, protective clothing, disinfectants, etc.) shall be routinely stored for at least one month to ensure that the health and safety of employees and the normal operation of the company's business will not be affected once infectious diseases and other public health incidents occur.

(3) Suppliers shall prohibit the consumption of wild animals and dangerous foods that are likely to cause infectious diseases and other public health incidents to avoid collective infection incidents or other public health incidents due to improper internal management and protection.

2.8 Health and Safety Communication

Suppliers shall inform employees of the occupational safety and health hazards they may face in their work and provide employees with appropriate workplace health and safety information and training in a language they can understand to address all identified workplace hazards that employees may face, including but not limited to mechanical, electrical, chemical, fire, and

physical hazards. Health and safety - related information shall be clearly posted in the factory or placed in locations that employees can identify and access. Suppliers shall encourage employees to raise any health and safety issues and promptly resolve and respond to them without retaliation.

2.9 Product and Service Delivery

The delivery of products and/or services shall conform to the general principle of health and safety risk prevention. The general principles include identifying, reducing, and preventing hazards, using competent and well - trained personnel, providing and maintaining safety equipment and tools, including the required personal protective equipment.

2.10 Absolute Rules

Suppliers shall comply with the following rules, ensure that all personnel fully understand and comply with them, and supervise their implementation:

- (1) Seat belts shall always be worn when the vehicle is running or driving;
- (2) When working high above the ground, appropriate personal protective equipment, safety belts and fall prevention equipment should be used; Safety ropes should always be worn during aerial work;
- (3) Never engage in live working of electrical equipment, lines and gear devices without corresponding qualifications or in conformity with relevant regulations;
- (4) Never work under the influence of alcohol or drugs, when these substances (alcohol or drugs) are prohibited or exceed the legal dose, or will affect the ability to perform tasks;
- (5) Never use a mobile phone while driving. You can only answer the phone when the vehicle is pulled over or using a hands-free device under the condition of ensuring safety;
- (6) Never exceed the speed limit or drive at a speed that is dangerous to roads, vehicles or other things.

3. Environmental Protection

Suppliers should realize that environmental responsibility is an important part of producing world-class products. In manufacturing operations, we should minimize the adverse effects of products and activities on communities, environment and natural resources, while protecting public health and safety. Suppliers shall be encouraged to implement an environmental management system based on the requirements of the ISO 14001 international standard.

The environmental standards can be summed up as follows:

3.1 Environmental Permits and Reporting

All necessary environmental permits (such as emission monitoring), approval documents and registration certificates shall be obtained, maintained and updated, and their operation and reporting requirements shall be observed.

3.2 Environmental Design

Suppliers shall ensure that appropriate measures are taken to improve the environmental performance of products and services, such as considering the energy efficiency and life cycle of the products and/or services they supply during the design stage. Suppliers shall adopt innovative products and/or services to provide social and environmental benefits.

3.3 Pollution Prevention and Resource Conservation

All kinds of resource consumption and pollution (including water and energy) should be reduced and eliminated at the source or through practice (such as improving production,

maintenance and facilities, replacing materials, saving resources, and recycling and reusing materials).

3.4 Hazardous Substances

Chemicals and other materials that may cause danger when released into the environment should be identified and controlled to ensure their safe handling, transportation, storage, use, recovery or reuse and disposal.

3.5 Wastewater and Solid Waste

Suppliers should adopt a systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid wastes (non-hazardous substances). The wastewater generated from operation activities, industrial processes and sanitary facilities shall be identified, monitored, controlled and treated as required before being discharged or disposed. In addition, measures should be taken to reduce the production of wastewater. Suppliers shall routinely monitor the performance of their wastewater treatment systems.

3.6 Exhaust Gas Emissions

The emission of volatile organic chemicals, aerosols, corrosives, dust, ozone-depleting chemicals and combustion by-products generated in the course of operation should be identified, monitored, controlled and treated as required before emission. Suppliers shall routinely monitor the performance of their exhaust emission control systems.

3.7 Material Restrictions

Suppliers shall comply with all applicable laws, regulations and customer requirements regarding the prohibition or restriction of the use of specific substances in products and manufacturing processes (including the labels on recycling and disposal).

3.8 Stormwater Management

Suppliers shall take a systematic approach to prevent storm runoff pollution. Suppliers shall prevent illegal discharges and leaked substances from entering drainage channels.

3.9 Energy Consumption and Greenhouse Gas Emissions

Suppliers shall track and record energy consumption and greenhouse gas emissions at the workplace and/or enterprise level. Suppliers shall seek cost-effective ways to improve energy efficiency and minimize energy consumption and greenhouse gas emissions.

4. Business Ethics Requirements

In order to fulfill social responsibility and establish a successful position in the market, suppliers should follow the highest ethical requirements, including:

4.1 Integrity in Business Operations

The highest standards of integrity should be followed in all business activities. Suppliers shall adopt a zero tolerance policy and prohibit any form of bribery, corruption, extortion and misappropriation of public funds. All business transactions should be transparent and accurately reflected in the supplier's business accounts and records. Monitoring and strengthening procedures shall be implemented to ensure compliance with the requirements of anti-corruption laws.

4.2 No Improper Benefits

Do not promise, offer, grant, give or accept bribes or other forms of inappropriate or improper benefits. The scope of prohibition covers promising, providing, granting, giving or accepting

anything of value, directly or indirectly through a third party, for the purpose of obtaining or retaining business, assigning business to anyone or otherwise obtaining illegitimate benefits.

4.3 Information Disclosure

Suppliers shall disclose information regarding their labor practices, health and safety, environmental practices, business activities, organizational structure, financial status, and performance in accordance with applicable regulations and prevailing industry practices. Falsification of records or deliberate misrepresentation of conditions or practices in the supply chain is not allowed.

4.4 Intellectual Property Rights

Intellectual property rights shall be respected. The transfer of technology or know-how shall be conducted in a manner that safeguards intellectual property rights; and customer information shall be protected.

4.5 Fair Business Practices, Advertising, and Competition

Suppliers shall uphold the highest standards of fair business practices, truthful advertising, and ethical competition. Customer information must be protected in an appropriate manner. It is necessary to comply with the applicable anti-monopoly and competition laws in the place where business is conducted to maintain fair market competition. Maintain honesty in business transactions, provide accurate information, and avoid false advertising or misleading statements. Treat all customers and partners fairly and do not exclude competitors in an unfair manner. It is forbidden to gain competitive advantage through fraud, misleading or other improper means, and it is necessary to refrain from any behavior that restricts competition, such as price manipulation and market segmentation.

4.6 Identity Protection and No - Retaliation Policy

Unless expressly prohibited by law, procedures should be established to protect whistleblowers among downstream suppliers and employees and ensure the confidentiality and anonymity of their identities. Suppliers shall establish communication procedures so that employees can raise doubts without fear of retaliation.

Whistle-blower: refers to anyone who exposes the misconduct of an employee or official of a company, or a public servant or official organization.

4.7 Responsible Mineral Sourcing

Suppliers shall undertake and take reasonable measures to ensure that the procurement of tantalum (Ta), tin (Sn), tungsten (W), gold (Au), cobalt (Co) and other related minerals contained in their products conforms to the principles of responsible procurement. Suppliers shall support responsible procurement from specific mining areas, but must prevent mining or trade from directly or indirectly contributing to illegal armed conflicts or involving violations of human rights, including but not limited to forced labor, child labor, health and safety hazards, and environmental damage.

Suppliers should conduct due diligence in accordance with recognized international standards (such as the OECD Due Diligence Guidance for Responsible Supply Chains in Conflict-Affected and High-Risk Areas), review the source and chain of custody of relevant minerals, and provide due diligence results and relevant compliance documents as required by customers to ensure transparency and compliance of the supply chain.

4.8 Privacy

Suppliers shall commit to protecting the reasonable privacy expectations of all business stakeholders, including suppliers, customers, consumers, and employees. Suppliers shall comply with applicable privacy and information security laws and regulations when collecting, storing, processing, transmitting, and sharing personal information.

5. Management System Requirements

Suppliers shall adopt or establish a management system with a scope aligned to this Code's requirements. When designing this management system, it should be ensured that: (1) it complies with laws, regulations, and customer requirements applicable to the supplier's operations and products; (2) it adheres to this code; and (3) it identifies and mitigates operational risks related to this Code. This system should also facilitate continuous improvement.

The management system should include the following elements:

5.1 Supplier Commitment

The corporate social and environmental responsibility policy statement should clarify the supplier's commitment to compliance and continuous improvement, and it should also be signed by the management, published in the local language, and posted in the workplace.

5.2 Management Accountability and Responsibility

Suppliers shall designate senior managers and company representatives with explicit authority to implement the management system and associated programs. Senior managers should regularly review the status of the management system.

5.3 Legal Requirements and Customer Requirements

Establish procedures to identify, monitor, and understand applicable laws and regulations as well as customer requirements (including the requirements of this Code).

5.4 Risk Assessment and Risk Management

Establish procedures to identify legal compliance, environmental, health and safety issues, labor practice, and ethical risks associated with the supplier's operations. Determine the relative significance of each risk and implement appropriate procedures and substantial control measures to mitigate the identified risks and ensure compliance.

The environmental, health and safety risk assessment includes the aspects such as warehouses and storage facilities, factory/workplace support equipment, laboratories and testing areas, sanitation facilities (bathrooms), kitchens/internal restaurants, and employee residences/dormitories.

5.5 Improvement Objectives

Establish written performance objectives, indicators, and implementation plans for the improvement of the supplier's social and environmental performance, including regular assessment on whether the suppliers manage to achieve their performance objectives.

5.6 Training

Develop and implement a plan to train managers and employees on the supplier's policies, procedures, and improvement objectives and compliance with applicable laws and regulations.

5.7 Communication

Establish procedures to definitely and accurately convey information about supplier policies, practices, expectations, and performance to employees, downstream suppliers, and customers.

5.8 Employee Feedback and Participation Mechanism

Establish an ongoing procedure to assess employees' comprehension of the practices and conditions outlined in this Code, solicit feedback, and promote continuous improvement.

5.9 Audit and Assessment

Conduct regular self - assessments to ensure compliance with laws and regulations related to social and environmental responsibilities, the provisions of this Code, and customer contract requirements.

5.10 Procedures for Corrective Action

Establish and implement procedures to promptly address deficiencies identified through internal or external assessments, inspections, investigations, and audits.

5.11 Documentation and Records

Create and maintain documentation and records to ensure compliance with laws, regulations, and meeting corporate requirements while safeguarding confidentiality and privacy in accordance with data protection obligations.

5.12 Supplier Responsibilities

Establish procedures to communicate the requirements of this Code to suppliers and monitor their compliance therewith.

6. Miscellaneous

This Code shall come into effect upon its release. Dahua reserves the right to modify or abolish any provision(s) of this Code or implement new codes at any time it deems appropriate.

Signature: Zhicheng Xu

Zhicheng Xu

Senior Vice President

Zhejiang Dahua Technology Co., Ltd.