

ENNOCONN CORPORATION

Anti-Corruption and Anti-Bribery Policy

Policy Document

Revision History

Version	Revision Date	Content
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Article 1 Purpose

To foster a corporate culture of integrity at Ennoconn Corporation (the “Company”) and to prevent the Company and its subsidiaries from engaging in corruption, bribery, kickbacks, facilitation payments, or any other improper transfer of benefits in the course of business operations, this Policy is established in accordance with the *Company’s Procedures for Ethical Management and Conduct Principals* and with due regard to the *United Nations Convention against Corruption (UNCAC)*, the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, and other applicable laws and regulations. This Policy serves as the basis for the Company’s anti-corruption and anti-bribery management framework.

Article 2 Policy Statement

1. The Company upholds the principles of fairness, honesty, good faith, and transparency in its business operations, and adopts a zero-tolerance approach to all forms of corruption and bribery.
2. The Company and all applicable persons shall not, directly or indirectly, offer, promise, request, solicit, give, receive, or accept any improper benefit, nor engage in or circumvent any corrupt or bribery-related conduct through third parties, consultants, agents, suppliers, distributors, contractors, charitable donations, sponsorships, political contributions, employment opportunities, or any other arrangement.

Article 3 Legal and Governance Basis

This Policy is established in accordance with the following:

1. The Company's Procedures for Ethical Management and Conduct Principals.
2. The Company's relevant internal control systems, approval authority matrix, whistleblowing mechanism, and personnel regulations.
3. Applicable laws and regulations in the jurisdictions where the Company operates relating to anti-corruption, anti-bribery, commercial bribery, government procurement, conflicts of interest involving public officials, accounting books and records, and record retention.
4. Other international initiatives, customer requirements, and sustainability governance assessment principles with which the Company is required to comply.

Article 4 Scope of Application

1. This Policy applies to the Company and its subsidiaries, foundations or incorporated entities to which the Company directly or indirectly contributes more than 50% of total funding, and any other group enterprises or organizations over which the Company exercises substantive control.
2. Persons subject to this Policy include directors, managerial officers, employees, appointees, agents, consultants, and any other persons acting on behalf of the Company.

3. The Company shall also promote anti-corruption and anti-bribery requirements consistent with this Policy among its suppliers, contractors, agents, distributors, customers, joint venture partners, and other business counterparties.

Article 5 Definitions

For the purposes of this Policy, the following terms shall have the meanings set out below:

1. **Corruption:** Any act by which a person abuses his or her office, authority, influence, or entrusted position for personal gain or for the benefit of a third party.
2. **Bribery:** The direct or indirect offering, promising, requesting, soliciting, giving, receiving, or accepting of any improper benefit in order to influence a decision, obtain or retain a business opportunity, secure an undue advantage, or induce another person to breach his or her duties, legal obligations, or fiduciary responsibilities.
3. **Benefit:** Any form of money, gifts, gratuities, commissions, kickbacks, rebates, services, entertainment, hospitality, travel, positions, employment opportunities, sponsorships, donations, facilitation payments, or any other item of value, regardless of form or name.
4. **Facilitation Payment:** Any payment or other benefit made to a public official or related person in order to expedite or secure the performance of a routine administrative action that such person is already legally required to perform.
5. **Public Official:** Any person recognized as such under the laws and regulations of the jurisdictions in which the Company operates, including personnel of

government agencies, state-owned enterprises, international organizations, and persons exercising public authority.

6. **Third Party:** Any legal entity, organization, or individual having a transactional, cooperative, agency, contracting, mandate, supply, sales, investment, or other business relationship with the Company.

Article 6 Prohibition of Corruption and Bribery

In carrying out business activities, the Company and all applicable persons shall not engage in any of the following:

1. Offering, promising, or delivering any improper benefit to any person.
2. Requesting, soliciting, receiving, or accepting any improper benefit from any person.
3. Receiving or making kickbacks, commissions, cash gifts, consulting fees, service fees, incentive payments, or payments under any other name without a reasonable, genuine, and verifiable quid pro quo.
4. Using any third party to offer or receive bribes, or to circumvent this Policy.
5. Making improper transfers of value in order to obtain or retain orders, tenders, permits, subsidies, acceptance approvals, payments, customs clearance, inspections, certifications, tax benefits, or any other commercial advantage.
6. Using donations, sponsorships, entertainment, travel, employment arrangements, internship opportunities, or any other form of benefit as a disguised means of bribery.
7. Maintaining off-the-books accounts, creating false documentation, or using inaccurate records to conceal the flow of improper benefits.

Article 7 Gifts, Hospitality, Entertainment, and Other Benefits

When Company personnel offer, receive, promise, request, or accept gifts, hospitality, entertainment, or other benefits, they shall comply with the *Company's Procedures for Ethical Management and Conduct Principals* and related internal procedures, and such conduct must not impair objective judgment or create an improper quid pro quo relationship.

Article 8 Prohibition of Facilitation Payments

1. The Company strictly prohibits the offering, promising, requesting, soliciting, giving, receiving, or accepting of facilitation payments in any form.
2. If a facilitation payment is made under duress due to an immediate threat to life, physical safety, personal liberty, or security, the person involved shall report the matter immediately afterward to his or her direct supervisor and the responsible authority unit, and provide supporting evidence for follow-up handling.

Article 9 Political Contributions

Any political contribution made by the Company shall comply with applicable laws and regulations and the *Company's Procedures for Ethical Management and Conduct Principals*, and shall not be made for the purpose of obtaining commercial benefits, transactional advantages, or improper influence over public authority.

Article 10 Charitable Donations and Sponsorships

Any charitable donation or sponsorship made by the Company must serve a legitimate public welfare, social participation, or brand development purpose, and shall not be used as a disguised form of bribery or improper transfer of benefits.

Article 11 Education and Training

The Company shall provide anti-corruption and anti-bribery education, training, and awareness programs on a regular basis to directors, managerial officers, employees, and personnel in high-risk functions. Where necessary, such training may be extended to key agents and third parties.

Article 12 Whistleblowing Mechanism

1. The Company shall establish and publicly announce reporting channels for internal and external parties to report suspected violations of this Policy or applicable laws and regulations.
2. Reports may be made on a named or anonymous basis, and the receiving unit shall record, classify, and process such reports in accordance with applicable procedures.

Article 13 Confidentiality and Non-Retaliation

1. The Company shall keep confidential the identity of whistleblowers, the content of reports, evidentiary materials, and the investigation process.

2. No person may dismiss, demote, reduce the salary of, threaten, harass, discriminate against, or otherwise adversely treat any whistleblower, witness, person assisting in an investigation, or person who refuses to engage in improper conduct.
3. Any violation of the preceding paragraph shall be deemed a material disciplinary breach.

Article 14 Disciplinary Actions for Violations

Where a person violates this Policy, the Company may take one or more of the following actions depending on the severity of the circumstances:

1. Education, corrective action, or written warning.
2. Reprimand, demerit, demotion, suspension, removal from office, or dismissal.
3. Termination of contract or suspension of business dealings.
4. Claims for damages.
5. Reporting to the competent authorities or referral to judicial authorities in accordance with law.

Article 15 Review and Update

The Company may review and revise this Policy as necessary in light of changes in laws and regulations, operational risks, industry practices, and corporate governance needs, in order to ensure its appropriateness and effectiveness.

Article 16 Relationship with Other Internal Policies

1. This Policy is the Company's dedicated anti-corruption and anti-bribery policy and shall be applied together with the *Company's Procedures for Ethical Management and Conduct Principals* and other relevant internal rules.
2. If this Policy differs from the laws and regulations of the jurisdictions in which the Company operates or from any other internal rules of the Company, the stricter standard shall apply; provided, however, that the fundamental principles and established approval thresholds under the *Company's Procedures for Ethical Management and Conduct Principals* shall not be derogated from.

Article 17 Approval and Implementation

This Policy shall take effect upon approval by the Chairman, and the same shall apply to any amendments hereto.

Chairman Steve Chu

A handwritten signature in black ink, appearing to read "Steve Chu", written over a horizontal line.