

# Sinyi Group Code of Conduct

## Article 1 Purpose

Based on the common philosophy and culture of Sinyi Group, and the corporate values created therefrom, the Company has set out the Sinyi Group Code of Conduct (hereafter referred to as “the Code”). All staff are hereby required to adhere to these common standards in their actions in any and all circumstances.

## Article 2 Applicable Targets

The Code applies to all staff of Sinyi Group, including fixed-term contractors.

## Article 3 Code of Conduct

### i. Conduct Toward Clients

#### a) Acting with Integrity Toward Clients

We must act with integrity toward clients, and must not manipulate, conceal, or misuse information in such a way as to impact the fairness of any transaction nor to gain personal benefit. We must be dedicated to protecting the rights and interests of our clients and to upholding our commitments to them.

#### b) Duty Before Profit

We firmly believe in the unchanging value of putting duty before profit through policies focused on quality of service and “both talking the talk and walking the walk” in terms of doing the right thing.

#### c) Putting Clients First

We are passionate about helping our clients realize their dreams, and do so through high-quality, attentive services, creating relationships of trust with clients that do not end when the transaction is complete.

#### d) Avoiding Conflicts of Interest

We emphasize the interests of our customers, and as such staff must work to avoid conflicts of interest with those customers. Should such conflicts arise, the rights and interests of the customer should take priority. Fairness should not be sacrificed for personal benefit.

#### e) Reasonable Remuneration

We only receive a reasonable amount of remuneration for our services, and the Company pays salaries and bonuses to staff as appropriate. Staff members must not use their position for the benefit of themselves or others, nor demand, agree to accept, offer, or accept any form of additional money or gift from clients. However, if a client does offer a gift, it shall be handled in accordance with the relevant regulations.

## ii. Staff Conduct

### a) Equal Opportunity

We respect one another and provide equal opportunities for employment and development to each of our staff. No one is to be discriminated against on the basis of race, gender, beliefs, marital status, or nationality, nor for any other reason.

### b) Cooperation and Division of Labor

We place the overall interest before personal interest, and should break the standard thinking in how we approach our work by cooperating with one another through mutual trust, as well as improving efficiency through expert division of labor.

### c) Protecting Health and Safety

We should strive to improve the working environment and ensure that our own health and safety, and that of our colleagues, is protected.

### d) Protecting the Company's Interests

We shall protect the interests of the Company, its assets, and its materials, not only avoiding damage or leaks due to external forces or improper use by staff, but also by not engaging in competitive behavior which conflicts with the interests of the Company.

### e) Use of Electronic Media

We shall make proper use of e-mail, voicemail, intranet, Internet, and other electronic media provided by the Company in line with the needs of our duties and the interests of the Company, as well as accepting relevant supervisory measures.

## iii. Conduct Toward Others in Industry

### a) Fair Competition

We shall treat our peers with modesty and courtesy and compete with them fairly.

### b) Improving the Industry's Image

We lead the development of the industry, and shall strive to improve the standard of service and overall image of that industry.

## iv. Conduct Toward Vendors

### a) Fair Trade and Treatment

We shall treat our vendors and subcontractors fairly, with any decision on procurement based on factors such as cost, quality, technology, delivery, efficiency, the financial situation of the vendor, and protection of the environment.

b) Prohibiting Improper Benefit

We must not use our position for our own personal gain or that of others, and shall not demand, agree to accept, offer, or accept any form of kickback, bribe, gift, or entertainment.

v. Conduct Toward the General Public and Environmental Protection

a) Corporate Social Responsibility

We shall strive to fulfill our responsibilities as citizens of society, working to make appropriate contributions and offer appropriate support to clients, colleagues, shareholders, the community, and society.

b) Environmental Protection

We shall be committed to environmental protection and to the conservation of energy and resources. In all business activities, we shall work to minimize negative impacts on the environment.

vi. General Principles: We shall formulate rules and regulations in line with the spirit of both the founding mission of the Company and of this Code. Staff behavior shall be in compliance with relevant rules, and should such rules prove insufficient, behavior shall be governed by this Code. Should the Code prove insufficient, then the Group's founding mission shall apply.

Article 4 This Code shall come into effect upon its approval. The same shall apply to any amendments.