Zhen Ding Tech Holding

Ethical Corporate Management Item	Ethical Corporate Management Content
1.Promoting Integrity Management Working Group	Our company establish the "Ethical Corporate Management Work Group" under The Board of Directors，jointly formed by the Company's Human Resources Division, Legal Affairs Division, Investment Management Division .The Chairman's Office is responsible for the establishment, supervision, and execution of ethical corporate management policies and prevention solutions， which regularly reports to the board of directors once a year on the integrity management policy and the plan to prevent dishonest behavior and the supervision. In order to implement honest management, the company has established an effective accounting system and internal control system，which reviewed and checked regularly at any time to ensure the design and implementation of the system effectively and continually. The audit personnel also supervise the implementation of the policy in their daily audits and report to the Board of Directors if they find any irregularities or reports raised, as well as the follow-up review of improvement measures.
2.Promoting the annual plan of the Integrity Management Working Group	In accordance with the regulation of Integrity Management Code and Integrity Management Operating Procedures and Behavior Guidelines, the annual targets were set at the beginning of the year and the results were reviewed at the end of the year. The following are the goals in 2024 and outcomes in 2023, respectively. **Goals in 2024:** (1) The goals of internal and external education on business integrity are achieving 73,000 training hours and 70,000 participants. (2) All of our employees have completed business integrity, anti-corruption, confidentiality and ethical education and training, and all of them have passed the examinations. (3) Major suppliers accept the company's Sunshine Policy promotion and sign a letter of commitment. (4) The company has no major violations. Outcomes in 2023: (1) The indirect and direct employees have fully completed business integrity, anti-corruption, confidentiality and ethical courses with 100% examination participation rate and 100% pass rate. (2) The Board of Directors has continue training and accomplished courses include ESG regulation update, the potential risks regarding to ESG and insider trading, surpass 52 managers attend and accumulate over 156 hours. (3) 1,004 newly recruited indirect and direct employees have completed the operation rules training with the 91% passing rate. (4) The company has promoted business ethics and highlights the concepts of business integrity in 336 suppliers' meetings. Moreover, more than 217 suppliers attend the annual supplier meeting in April, which enhance the importance of integrity. (5) Over 1,345 suppliers participate in the Sunshine Policy and surpass 1,268 have made commitment to

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	comply with Sunshine Policy.
	(6) In 2023, various internal and external training programs were held on topics such as integrity management, including training for new employees, quality management, professional skills, management capabilities, integrity and compliance regulations, ethical behavior, internal sensitive information, food safety and hygiene management, accounting systems, internal controls, significant information, insider trading, anti-corruption, ethical issue, etc., the total duration of these training sessions amounted to 74,163 hours, with more than 71,081 participants.
	(7) The company conducts promotion via platform in the internal areas and factories. Two themes were selected each month and displayed four times per day; the annual reach exceeds 1.15million.
	(8) Business ethics and integrity index was included in employee's performance evaluation.
	(9) The company has no major violations and no violation report received.
3.Formulate policies to prevent conflicts of interest and provide appropriate representation channels	The company's *Integrity Management Operation Procedures and Behavior Guidelines* and *Anti-corruption, Prosperity, Pros and Disadvantages Management Measures* are used to monitor and manage risks of dishonest behaviors that may result from conflicts of interest, and provide appropriate reporting channels for directors, managers and other interested parties take the initiative to explain and implement them; in addition, the channel of conflict of interest statements provided by the company is divided into different entities according to different entities: directors or independent directors should report to the chairman's office; managers should report to the Legal compliance unit.
4.Integrity management and implementation with transaction partners	The Company evaluates the legal compliance and unethical conduct records of its agents, suppliers, customers, or other transaction counterparties before conducting business transactions to prevent transactions with companies that have records of unethical conduct. When entering into contracts with others, the company includes in such contracts terms requiring compliance with ethical management policies. In the event that the trading counterparties are involved in unethical conduct, the company may at any time terminate or rescind the contracts, ensuring the compliance of others with the company's ethical management policies.
6. Whistleblowing Policy and Procedure	According to the Integrity Management Operating Procedures and Behavior Guidelines, the company has established an independent mailbox (zdt-report@zdtco.com) and hotline (03-3835678) for internal and external reporting. All prosecutions are anonymous and the identity and related information of the reporters will be confidential. Specific agency are in charge with the reports, and once there is evidence supporting violation, penalty will be given and if necessary the case will be send to the judicial authorities for further investigation. All cases will be sending to the Board of Director for improvement.