

## Zhen Ding Technology Holding Limited

### 2024 Implementation Result of Business Ethics (Updated: January 2025)

Items	Status
<b>1. Promoting Integrity Management Working Group</b>	<p>The Group established the "Ethical Corporate Management Work Group" under the Board of Directors. This group is jointly formed by the Human Resources Division, Legal Affairs Division, and Corporate Governance and Investor Relations Division. The Chairman's Office is responsible for the implementation of ethical corporate management policies and preventive solutions. The execution unit and related task force are tasked with supervising the operation of business ethics and are required to report to the Board of Directors at least once a year on the status of implementation for the current year.</p> <p>In order to enhance integrity, we implemented an effective accounting system and internal control framework, which are regularly reviewed and assessed to ensure their design and implementation remain effective and up to date. The audit personnel also supervise the execution of the policy during their daily audits and report any irregularities or concerns to the Board of Directors, along with follow-up reviews of improvement measures.</p>
<b>2. Promoting the annual plan of the Integrity Management Working Group</b>	<p>According to "Ethical Corporate Management Best Practice Principles" 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 2025 and outcomes in 2024, respectively.</p> <p><b>Goals in 2025:</b></p> <ol style="list-style-type: none"> <li>(1) The goals of internal and external education on business integrity are achieving 185,000 training hours and 102,000 participants.</li> <li>(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.</li> <li>(3) Major suppliers accept the group's Sunshine Policy promotion and sign a letter of commitment.</li> <li>(4) The group has no major violations.</li> </ol> <p><b>Outcomes in 2024:</b></p> <ol style="list-style-type: none"> <li>(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.</li> <li>(2) The Board of Directors has continue training and accomplished courses include ESG regulation update, the potential</li> </ol>

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	<p>risks regarding to ESG and insider trading, surpass 195 people attend and accumulate over 585 hours.</p> <p>(3) 1,250 newly recruited indirect and direct employees have completed the operation rules training with the 81% passing rate.</p> <p>(4) The group has promoted business ethics and highlights the concepts of business integrity in 326 suppliers' meetings.</p> <p>(5) Over 1,443 suppliers (coverage rate: 90.13%) participate in the Sunshine Policy and have made commitment to comply with Sunshine Policy.</p> <p>(6) In 2024, 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 180,706 hours, with more than 101,066 participants.</p> <p>(7) Business ethics and integrity index was included in employee's performance evaluation.</p> <p>(8) The group promotes integrity through platform in internal areas and factories. Each month, two themes are selected and displayed four times a day, resulting in an annual reach that exceeds 1.7 million.</p> <p>(9) In 2024, four articles on integrity management were published in the Dingsheng Journal in July, September, October, and November.</p> <p>(10) Ding+ application promote integrity management initiatives on a monthly basis.</p> <p>(11) The group has received certification for its compliance management system in accordance with ISO 37301:2021.</p> <p>(12) The group has no major violations, and no relevant reports have been received by the competent authority. Details are as follows:</p> <table data-bbox="622 1015 2074 1248"> <tr> <th>Reporting areas</th><th>Number of breaches in FY 2024</th></tr> <tr> <td>Corruption or Bribery</td><td>0</td></tr> <tr> <td>Discrimination</td><td>0</td></tr> <tr> <td>Customer Privacy Data</td><td>0</td></tr> <tr> <td>Conflict Interest</td><td>0</td></tr> <tr> <td>Money Laundering or Insider Trading</td><td>0</td></tr> </table>	Reporting areas	Number of breaches in FY 2024	Corruption or Bribery	0	Discrimination	0	Customer Privacy Data	0	Conflict Interest	0	Money Laundering or Insider Trading	0
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<b>3. Formulate policies to prevent conflicts of interest and provide appropriate representation channels :</b>	In accordance with “Ethical Corporate Management Operating Procedures and code of conduct” and “Policy on Preventing Fraud and Corruption” are used to monitor and manage risks of dishonest behaviors that may result from conflicts of interest. Once discover violation, one can report to independent directors or audit committee, managers, legal affairs and audit units, immediate supervisor or other appropriate person.
<b>4. .Integrity management and implementation with transaction partners</b>	The group assesses the legal compliance and records of unethical conduct of its agents, suppliers, customers, and other transaction counterparties prior to engaging in business transactions. This evaluation aims to prevent dealings with entities that have a history of unethical behavior. When entering into contracts, the group incorporates terms that mandate adherence to its ethical management policies. Should any trading counterparties be found to engage in unethical conduct, the group reserves the right to terminate or rescind the contracts at any time, thereby ensuring compliance with its ethical management standard.
<b>5. Whistleblowing Policy and Procedure</b>	According to the “Integrity Management Operating Procedures and Behavior Guidelines”, the group has established an independent mailbox (zdt@zdtco.com) and hotline (03-3835678) for both internal and external reporting. All reports are anonymous, and the identity and related information of the reporters will be kept confidential. A specific agency is responsible for handling the reports, and once there is supporting evidence, penalties will be imposed. If necessary, the case will be referred to the judicial authority for further investigation. All cases will be submitted to the Board of Directors for review and improvement.