

Anti-Corruption Management Statement

Beijing HyperStrong Technology Co., Ltd. (hereinafter referred to as "HyperStrong" or the "Company") abides by business ethics, continuously improves the anti-bribery and anti-corruption management system, enhances employees awareness of compliance through system management and training, and builds a fair and honest business environment with suppliers.

The company declares that all commercial corruption, including but not limited to accepting bribes or kickbacks, misappropriating and using company assets by improper means, concealing conflicts of interest, making false records or misleading statements or major omissions in financial and accounting reports and information disclosure, is resolutely prohibited. Strictly abide by relevant laws, industry norms and standards, professional ethics and company rules and regulations, establish a good atmosphere of integrity, diligence and dedication, and prevent behaviors that harm the interests of the company and shareholders.

This statement applies to Beijing HyperStrong Technology Co., Ltd. and all branches and subsidiaries within the scope of its consolidated statements, and requires all partners to actively abide by this

statement or similar policy requirements.

1. Key Risk Areas of Anti-corruption Work

1.1 Embezzlement or misappropriation of enterprise assets without authorization or other illegal means to seek improper benefits.

1.2 False records, misleading statements or major omissions in financial accounting reports and information disclosure.

1.3 Directors, supervisors, managers and other senior management personnel abuse their powers.

1.4 Relevant institutions or personnel collude with corruption.

2. Implementation of Anti-corruption Measures

2.1 Effective Communication and Training

The Company's anti-corruption policies, procedures, and related measures should be effectively communicated or trained within the Company in various forms (through employee handbook, company rules and regulations publishing, publicity or local area network, etc.) to ensure that employees receive training on relevant laws, regulations and professional ethics, so that they can understand the concepts involved in the Code of Conduct; Help employees identify legal and illegal behaviors, integrity ethics and non-integrity ethics. The Company signed the Employee Integrity and Self-discipline Commitment Letter with its employees to ensure that all employees are aware of the Company's serious attitude towards preventing

corruption and employees own responsibilities in anti-corruption, and consciously strive to improve their anti-corruption ideological level and skills.

2.2 Corruption Risk Assessment and Control Mechanism

Corruption risk assessment is included in the managements corporate risk assessment. The management should identify and evaluate corruption risks at the company level, business department level and major account level, including the importance and possibility of corruption risks. These assessments also include false financial reporting, misappropriation of company assets and unauthorized or inappropriate income or expenditure, as well as assessments of corruption risks including top management or the board of directors.

The management establishes and takes measures to identify, prevent and reduce false financial reports or abuse of company assets. Establish necessary internal control measures for areas with high risk of corruption. These measures include compiling business processes and formulating management systems, linking the risks of business corruption and financial corruption with control measures, so as to establish and play a role in control mechanisms at the source of corruption.

2.3 Institutional Dynamic Management Mechanism

In the design and formulation of the system, the company clearly defines the authority of the subject of system formulation in accordance with the management methods of rules and regulations. Strictly implement the procedures for formulating rules and regulations, strengthen the centralized management and unified audit of the system, and enhance the scientificity, systematicness, rigor and binding of the system construction, so that the rules and regulations are in line with the actual work and operational, and eliminate management loopholes, which are binding and monitoring.

3. Supplier Anti-Corruption Management

The Company signed a declaration document with its suppliers to standardize business cooperation behaviors, prevent corruption incidents and safeguard the common interests of both parties. The Company regularly conducts anti-corruption investigations on suppliers, identifies supplier corruption risks, adopts hierarchical management of suppliers and adopts different management measures.

4. Whistleblowing and Supervision and Handling Mechanisms

The internal audit department of the Company is responsible for establishing and publishing complaints and reporting channels such as corruption complaints and reporting hotline and e-mail box, and

receiving and accepting all complaints and reporting information against employees within the Company. The internal audit department has dedicated personnel to check the reporting mailbox at any time and make records to ensure that complaints and reports are accepted in a timely manner.

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The investigation of complaints and reports by the internal audit department should include all complaints and reports. During the investigation process, it should be based on facts, fully obtain evidence, and extensively solicit opinions. If necessary, it can form an investigation team with relevant departments such as human resources or hire external experts to conduct investigations, and the investigation conclusion should be fully communicated with the complaint and whistleblower.

After the investigation of corruption cases is completed, the Internal Audit Department prepares a report on the investigation of corruption cases and reports to the relevant leaders, the Chairman of

the Board, the Audit Committee and the Board of Directors according to the nature of the cases

5. Whistleblower Protection

The Company encourages employees to report any corrupt behavior, unethical behavior and dishonest behavior, and the internal audit department, leaders at all levels of the Company and relevant parties are obliged to keep the information security of whistleblowers strictly confidential.

Beijing HyperStrong Technology Co., Ltd

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1st Edition

The final right of interpretation belongs to HyperStrong