

## Code of Business Conduct

### Purpose

Guangdong Dongpeng Holdings Co., Ltd. (hereinafter referred to as "Dongpeng Holdings" or "the Company") upholds the core values of "Customer First, Value Orientation, Integrity, Accountability, Collaboration and Innovation." As the Company continues to grow and deliver products and services to countless households, Dongpeng Holdings commits to high standards of corporate social responsibility and sustainable development. Dongpeng Holdings requires all employees to strictly adhere to this *Code of Business Conduct* and lead by example to uphold market integrity.

Through a transparent and standardized policy framework, the Company aims to meet business challenges with consistent values and expect all stakeholders to follow equivalent ethical standards, fostering a healthy economic ecosystem and long-term mutual success.

### Scope of Application

This Code applies to Dongpeng Holdings' headquarters, production sites and all sales subsidiaries. Affiliated companies may adopt this Code by reference. It also applies to all business partners acting for or on behalf of Dongpeng Holdings, including but not limited to suppliers, agents and consultants.

### 1. Anti-Corruption & Anti-Bribery

Dongpeng Holdings strictly prohibits all forms of corruption and bribery, whether direct or indirect, including offering, providing, accepting, or authorizing bribes. Dongpeng Holdings has implemented the *Gift Acceptance Management Policy* to clearly define the prohibition of gift acceptance by employees, penalties for violations and handling procedures.

The Company complies with all relevant anti-corruption laws and regulations and does not use gifts or entertainment to maintain business relationships. If required by local customs or etiquette, any gift or entertainment must:

- Serve a legitimate business purpose;
- Be in line with local business practices;
- Not violate local laws or internal company policies;
- Not constitute bribes, kickbacks, commissions, or improper benefits.

Our employee performance appraisal system has integrated employees' compliance performance and adherence to this *Code of Business Conduct*.

### 2. Non-Discrimination and Equal Opportunity

Dongpeng Holdings fosters a diverse workforce and prohibits any form of discrimination based on gender, age, race, religion, etc. Dongpeng Holdings also prohibits retaliation, harassment, or any form of abuse in the workplace. A safe working environment is provided, with regular occupational health training. The use of child labor or any form of forced labor is strictly prohibited.

### 3. Confidentiality of Information

To ensure the security, confidentiality, and integrity of information assets, Dongpeng Holdings has established the *Information Security Management Policy (2024a version)* and the *Information Security Incident Response Standard (2024a version)*. These documents define our objectives and requirements for protecting sensitive information and supporting the Company's digital strategy.

### 4. Conflicts of Interest

Dongpeng Holdings prohibits employees from using their position or the Company resources for personal gain. Our *Employee Handbook* requires all key personnel and executives to declare personal

relationships that may affect corporate decision-making (e.g., relatives working at supplier companies).

## 5. Antitrust and Anti-Competitive Practices

Dongpeng Holdings complies with all applicable laws on competition, antitrust, and information collection. Dongpeng Holdings does not tolerate unethical or illegal methods to gain competitive advantage or obtain trade secrets.

## 6. Anti-Money Laundering and Insider Trading

Dongpeng Holdings strictly prohibits employees from participating in money laundering. All employees must comply with anti-money laundering laws.

Employees may access non-public, material information about the Company or its business partners. Such “insider information” must not be used for stock or securities trading or disclosed to others for trading purposes. Dongpeng Holdings fully complies with legal and policy prohibitions on insider trading.

## 7. Human Rights

Dongpeng Holdings supports equal pay for equal work, and strictly opposes child labor, forced labor, and human trafficking. Dongpeng Holdings has implemented due diligence procedures to monitor compliance and ensure adherence to local laws on working hours and minimum wages.

Overtime must be pre-approved and managed in accordance with applicable labor laws.

## 8. Zero Tolerance (Non-Retaliation) Policy

Dongpeng Holdings encourages employees to report violations of laws, regulations, the Company policies, or ethical concerns. Dongpeng Holdings commits to keeping all whistleblower identities confidential. All concerns will be seriously addressed by management, and any form of retaliation is strictly prohibited.

## 9. Whistleblowing Channels

Dongpeng Holdings provides multiple channels for employees and business partners to report any misconduct behavior:

- Legal and Audit Department Hotline: +86-757-82666318 | Email: [fwjcb@dongpeng.net](mailto:fwjcb@dongpeng.net)
- Anti-Corruption Email: [dpljbg@dongpeng.net](mailto:dpljbg@dongpeng.net)
- Anti-Counterfeiting Hotline: +86-757-83553843 or 82666318
- Dongpeng Ceramic Tile Business Unit Hotline: +86-757-82708017 | Email: [shedongwei@dongpeng.net](mailto:shedongwei@dongpeng.net)
- Dongpeng Bathroom Business Unit Email: [dpzzwy@dongpeng.net](mailto:dpzzwy@dongpeng.net) | QR code for the dedicated reporting and complaint hotline



- The Group-wide and Business Unit-level Market Order Inspection and Maintenance Procedure (OA): RTM044 – Cross-regional Complaints / WeChat Speculative Trading / Anti-Counterfeiting / Trademark Infringement Complaint Process.

All departments and business units are required to respond to reports within 24 hours.