

2025

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152,000 99,000

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	<p><a href="http://www.avaryholding.com.cn/contact.aspx">http://www.avaryholding.com.cn/contact.aspx</a></p> <p><a href="mailto:avary@avaryholding.com">avary@avaryholding.com</a></p> <p>2025</p>

## Avary Holding (Shenzhen) Co., Limited

### 2025 Implementation Result of Business Ethics (Updated: March 2026)

Items	Status
<p><b>1. Promoting Integrity Management Working Group</b></p>	<p>Our company establish the "Ethical Corporate Management Work Group", jointly formed by the Chairman's Office, Human Resources Division, Legal Affairs Division. The working group has subordinate implementing units and related working groups responsible for supervising the operation of integrity management practices and reporting the annual implementation status to the Board of Directors at least once a year. 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.</p>
<p><b>2. Promoting the annual plan of the Integrity Management Working Group</b></p>	<p style="text-align: right;">Corporate</p> <p>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 2026 and outcomes in 2025, respectively.</p> <p><b>Goals in 2026:</b></p> <ol style="list-style-type: none"> <li>(1) The goals of internal and external education on business integrity are achieving 158,000 training hours and 98,000 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 company's Sunshine Policy promotion and sign a letter of commitment.</li> <li>(4) The company has no major violations.</li> <li>(5)</li> </ol> <p><b>Outcomes in 2025:</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) All directors attended courses on integrity management and insider trading prevention.</li> <li>(3) 1,754 newly recruited indirect and direct employees have completed the operation rules training with the 83% passing</li> </ol>

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	<p>rate.</p> <p>(4) The company has promoted business ethics and highlights the concepts of business integrity in 522 meetings.</p> <p>(5) Over 1,208 suppliers participate and sign in the Sunshine Policy.</p> <p>(6) In 2025, 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 152,000 hours, with more than 99,000 participants.</p> <p>(7)</p> <p>(8) 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 1.80million.</p> <p>(9) In 2025, two articles on integrity management were published in the Ding Sheng Journal in March and September.</p> <p>(10) Ding+ application promote integrity management initiatives on a monthly basis.</p> <p>(11) The company has no major violations, and no relevant reports have been received by the competent authority. Details are as follows:</p> <table border="1" data-bbox="593 810 2045 1026"> <thead> <tr> <th>Reporting areas</th> <th>Number of breaches in FY 2025</th> </tr> </thead> <tbody> <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> </tbody> </table>	Reporting areas	Number of breaches in FY 2025	Corruption or Bribery	0	Discrimination	0	Customer Privacy Data	0	Conflict Interest	0	Money Laundering or Insider Trading	0
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<p><b>3. Formulate policies to prevent conflicts of interest and provide appropriate representation channels</b></p>	<p>Avary Integrity Management Operating Procedures and Behavior Guidelines Policy on Preventing Fraud and Corruption 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.</p>												

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<p><b>4. Integrity management and implementation with transaction partners</b></p>	<p>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.</p>
<p><b>5. Whistleblowing Policy and Procedure</b></p>	<p>Avary "Integrity Management Operating Procedures and Behavior Guidelines". Specifically, we have established a whistleblowing and reward system, a convenient and independent whistleblowing mailbox and hotline, and a dedicated unit responsible for investigation and handling. We guarantee the confidentiality of whistleblowers' identities and the content of their reports, and protect whistleblowers from undue punishment for their reports. Our company has established and publicized an independent whistleblowing mailbox, <a href="mailto:avary@avaryholding.com">avary@avaryholding.com</a>, and a reporting system, <a href="http://www.avaryholding.com.cn/contact.aspx">http://www.avaryholding.com.cn/contact.aspx</a>, for use by both internal and external personnel. Anonymous whistleblowing is permitted. We will strictly maintain the confidentiality of whistleblowers' identities and the content of their reports, which will be investigated and handled by a dedicated unit. Any violations of our integrity management regulations will be dealt with appropriately according to the severity of the offense. If necessary, we will report to the competent authorities or transfer the case to judicial authorities for investigation. We will report the handling methods and subsequent review and improvement measures to the board of directors. No related reports were received by the competent authority in 2025.</p>