

YFI Partner Code of Conduct

1. INTRODUCTION

1.1. Applicability

This Partner Code of Conduct (“**Code**”) applies to service providers, suppliers of goods, consultants, independent contractors and any other partners (collectively “**Partners**”) of Yanfeng International Automotive Technology Co., Ltd. and its affiliates (collectively “**YFI**”).

1.2. Purpose and Commitment

YFI is committed to customer, shareholder and employee satisfaction as an industry leader with global competitiveness, and always conducting business with integrity and compliance.

YFI adheres to the highest ethical standards and expects Partners to use these principles as a basis in mutual dealings and regard them as criteria for maintaining lasting business relationships.

Accordingly, YFI Partners are expected to behave ethically and with integrity, and to comply with all applicable laws and regulations. Failure to do so will result in disciplinary action, including possible termination of your business relationship with YFI.

Complying with all applicable laws and regulations everywhere we operate is the policy of YFI. If there is any conflict between the legal obligations required by any applicable law or regulation and this Code, the applicable laws and regulations shall prevail.

Please read this Code of Conduct carefully and sign the attached Acknowledgement where indicated. If you have any questions, or if you need clarification either before you sign the Acknowledgement or in the future, please contact YFI or the respective affiliates.

2. GENERAL OBLIGATIONS

YFI expects all Partners to use professional, honest, and ethical judgment in fulfilling their responsibilities.

The duty of care you owe to YFI requires you to exercise your duties in good faith and in an honest manner.

Your duty of loyalty to YFI requires you to avoid self-dealing(s) and conflicts of interest(s).

YFI observes a “zero tolerance” policy with respect to conduct involving fraud, corruption, deceit or dishonesty, and/or any behavior that could reflect or put into question the integrity of YFI or the Partners.

3. SOCIAL RESPONSIBILITY

We expect that our Partners conduct your activities taking into account the social responsibilities toward your own employees and society, observing the 10 Principles of Social Responsibility and Sustainable Development of the UN Global Compact ;

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2: make sure that they are not complicit in human rights abuses

Labor

Principle 3: businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4: the elimination of all forms of forced and compulsory labour

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies

Anti-corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

It is vital that our Partners adhere to the U.N. Universal Declaration of Human Rights and the international labor organization conventions ratified and entered into force in the respective countries where they operate.

4. ENVIRONMENT PROTECTION

YFI respects, protects and cares about the environment and the communities where it operates. YFI products, services and manufacturing reflect this commitment, which is beneficial to the environment and YFI.

As Partners of YFI, you must comply with all applicable government regulations of manufacturing and selling countries relating to the health and safety of employees, environmental protection, toxic and hazardous substances and free trade. Also, you should achieve ISO14001, ISO45001 management system certification.

YFI and its Partners should develop sustainable products and processes, designed to minimize environmental impacts during their entire life cycle, including after their intended purpose and reduce any negative impact on the environment. Through continuous improvement, they should build a sustainable production system and supply chain to reduce carbon emissions and protect the environment. At the same time, YFI encourages innovation in environmental protection technology and management methods to continuously improve the environmental management system and performance and implement full life-cycle management to fulfill commitments to protecting the environment.

At YFI, the health and safety of employees, customers, facilities and partners is of the utmost importance. YFI and its Partners should create a safe and healthy working environment, continuously improving the occupational health and safety management system and performance and strive to prevent the occurrence of injuries and occupational diseases.

5. BUSINESS INTEGRITY

YFI is committed to fair competition and does not to use unethical methods to gain unfair business advantages.

Partners providing any services to YFI shall make reasonable commercial efforts to implement YFI's business integrity standards.

5.1. Anti-Corruption

As a governing principle, YFI does not permit the giving or receiving of payments, gifts, or anything of value, of any kind, to or from anyone in return for any improper, illegal, or unfair business advantage.

YFI fully complies with the Anti-Unfair Competition Law of the People's Republic of China, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the German Law on Fighting Corruption, and all anti-corruption laws in the countries in which YFI operates which prohibit offering or paying bribes or anything of value to a government official. Partners shall also pay close attention to the applicable antitrust laws and anti-corruption laws, including but not limited to the above-mentioned laws and regulations.

Any Partner, employee, director or stakeholder of the Partner shall also not offer, promise, give, or approve any payment to any employee, director or stakeholder of YFI or those of any other enterprise or company in connection with the business of YFI. Partners should immediately report any request, extortion, solicitation or acceptance of a bribe from or to any employee, director or stakeholder of YFI through the reporting mechanisms set forth in Section 9.5 of this Code.

Any Partner involved in violations of anti-corruption laws, anti-bribery laws, or commercial bribery rules and regulations during acting for or on behalf of YFI will be subject to contractual remedies and, where appropriate, termination of the business relationship. YFI reserves the rights to terminate the business relationship with a Partner if YFI has reason to believe the Partner has engaged in official corruption or commercial bribery misconducts even if it does not directly involve YFI.

Duty to report: Any Partner who believes that a violation of corruption or commercial bribery rules has been committed, is being committed, or is being planned must report the matter immediately through the reporting mechanisms set forth in Section 9.5 in this Code.

5.2. Conflict of Interests

If a Director, Supervisor or Senior Manager of a Partner is an employee or its direct relative (i.e., spouse, parents and children) or a previous or retired employee of YFI, Partners shall disclose the names and the potentially conflicting relationship to YFI as soon as the relationship is known to the Partner.

5.3. Trade Sanctions and Export Control

Partners shall abide by all laws and regulations related to international trade, including laws and regulations related to import and export, customs, embargo and sanctions, the U.S.-Mexico-Canada Agreement (USMCA) and other related trade agreements that apply to YFI's business. In addition, Partners shall comply with the classification, valuation, country of origin, license issuance, preferential plans, and record maintenance requirements stipulated in the relevant laws of the countries where the partners operate.

6. DATA PROTECTION AND PRIVACY

Partners shall abide by the data protection laws applicable to the regions and countries in which YFI operates, including but not limited to the Personal Information Protection Law of the PRC and the General Data Protection Regulations of the EU.

Partners shall adopt the same level of protection and control measures as YFI requires for the management and protection of personal data.

Partners should obtain the personal information of YFI employees, customers and business partners necessary for cooperation directly from YFI for legitimate purposes and limited to the amount necessary to fulfill these purposes. Partners shall protect such information in a safe manner and only use such information to the extent permitted by YFI and the individual.

Partners shall notify individuals or obtain their consent, if required by data protection laws, regarding the collection and processing of personal data to ensure their privacy rights.

Partner's collection, processing and application of personal data shall be limited to the scope necessary to achieve clearly defined and legitimate purposes.

7. CONFIDENTIALITY

YFI's confidential information is one of its most valuable assets and must be used and protected correctly.

Subject to any additional written instruction or agreement, the Partners shall sign the non-disclosure agreement with YFI as required and take proper protections of the confidential information of YFI, the detail actions shall include but not limited to keep such information secure, limit access, and avoid discussing or revealing such information in public places, etc.

These requirements extend even after the conclusion of a Partner's business relationship with YFI.

8. MEDIA INQUIRIES

To ensure that YFI speaks with one voice and provides accurate information regarding its business, if a Partner receives an inquiry related to YFI from a journalist or media representatives, the Partner must direct all such inquiries to YFI's Communications department in the region.

Partners are not permitted to discuss matters involving YFI with any reporters or other media representatives without the express written consent of YFI Communications.

YFI partners are not allowed to disclose proprietary information about the company and their relationship with the company on social media or in press releases without approval from YFI Communications.

9. ENFORCEMENT OF YFI'S COMPLIANCE POLICIES

This Code is based on YFI's core values and Yanfeng code of conduct, its commitment to best business practices, and applicable laws and regulations.

Accordingly, it is the responsibility of every YFI Partner to adopt and foster a culture of integrity and compliance, grounded on the notions of self-policing and self-reporting.

9.1. Compliance

Partners are expected to become familiar with, understand, and comply with the requirements of this Code and all relevant policies of YFI.

All Partners are obliged to make contractual arrangements to also ensure all of their Partners comply with the standards and rules set out in this Code.

9.2. Internal Audits and Investigations

When an alleged violation of this Code is reported, YFI will, at its own discretion, take prompt and appropriate action in accordance with the law and otherwise consistent with best business practices.

Partners are expected to cooperate fully with YFI representatives, both internal and external, who are conducting an internal investigation, audit, inquiry, or other review.

9.3. Disciplinary Action

Partners must ensure that this Code is enforced through appropriate disciplinary measures. Any Partner violating this Code, any other YFI policy, or applicable laws shall be subject to discipline, up to and including suspension or termination of a supply relationship.

YFI may refer for criminal prosecution any Partner or former Partner who has violated applicable laws and regulations.

YFI may institute a civil action in response to such violations to, among other things, enforce its legal and equitable rights, and to obtain restitution, contribution, and/or damages.

9.4. Non-Retaliation

Partners may not retaliate, directly or indirectly, or encourage others to do so, against any other Partner or YFI employee who reports a violation of this Code.

If Partners believe that retaliation has occurred, you should immediately report the conduct consistent with the mechanisms set forth in Section 9.5 of this Code. YFI will not permit retaliation of any kind against good faith related to violations to this Code or other illegal or unethical conduct.

9.5. Reporting Mechanisms

The Partners have a duty to report all suspected or actual violations of the Code, or of any applicable laws and regulations: Partners must make all such disclosures to YFI.

If Partners wish to report any such matter anonymously, you could visit the below webpages to make the reports:

In China: <https://chinahelpline.yanfeng.com/#/>

Other nations: <https://yanfeng.ethicspoint.com>

9.6. Revisions to the Code

YFI may revise or supplement this Code at any time. YFI will promptly distribute any such modifications, and at that time, Partners will be required to sign a new Acknowledgement to reaffirm that they will adhere to the latest version of the Code.

The Partner has a continuing obligation to familiarize themselves with revisions and to ensure that compliance with all laws and with this Code.

**ACKNOWLEDGEMENT OF RECEIPT OF
PARTNER CODE OF CONDUCT**

The undersigned hereby acknowledges receipt of the YFI Partner Code of Conduct (the “**Code**”) that applies to service providers, distributors, suppliers of goods, consultants, independent contractors and any other partners (“**Partners**”) of Yanfeng International Automotive Technology Co., Ltd. and its affiliates (collectively “YFI”).

The undersigned understands that compliance with this Code and all relevant policies of YFI is a condition of my continued service to YFI.

THE UNDERSIGNED HAS READ AND UNDERSTANDS THE TERMS OF THE ABOVE AND BY THE SIGNATURE BELOW AGREES TO COMPLY WITH SUCH TERMS. THE UNDERSIGNED CERTIFIES THAT THE UNDERSIGNED HAS ALL NECESSARY AUTHORITY TO SIGN THIS ACKNOWLEDGEMENT ON BEHALF OF THE COMPANY.

For and on behalf of

[please insert name of Partner]

Company Seal

Signature:

Name:

Title:

Date: