



Code of Conduct for Business Partners

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Mobvista Inc. (hereinafter referred to as "the Company" or "we") attaches great importance to compliant management of all types of partners, and incorporates compliance requirements into partner management policies, requiring all types of partners to learn and comply with the code of conduct, and leading partners to build compliant management capabilities. We conduct appropriate due diligence and authenticity verification on partners, encourage reporting of violations, punish partners for non-compliant behavior, and stop cooperation with non-compliant and untrustworthy partners.

I-Purpose and Scope

In order to ensure the continuous healthy development and positive cycle of the Company and its partners, and to establish compliant standards and ethical requirements adapted to the business, this *Code of Conduct for Partners* (hereinafter referred to as the "Code") is hereby promulgated.

This Code applies to all partners of the Company, including their employees, temporary staff, agents, and subcontractors. Company partners refer to any party that purchases products or services from the Company. The Company expects its partners to: 1) be familiar with and comply with the law; 2) maintain high standards of business ethics; 3) grow together with the Company.

II-Compliance with Laws

1. General Legal Compliance

Partners should operate in compliance with applicable laws, regulations, and international laws and rules in their place of registration and business location to ensure that legal compliance issues do not affect cooperation with the Company.

2. Protection of Workers

Partners should create a healthy, dignified, and fair working environment for their employees while ensuring that employees are not discriminated against or threatened by factors such as skin color, race, gender, religion, or political affiliation.

3. Government Clients

Partners should be aware that when conducting transactions with government agencies, public institutions, or state-owned enterprises, they must comply with the

applicable government procurement and bidding laws.

4. Marketing, Advertising, and Media

In the process of marketing and advertising, partners shall not make false statements or exaggerate the functionality of any product without the Company's consent and shall not disclose information about cooperation projects with the Company to the media without authorization. Partners shall not make incorrect statements or misrepresentations to anyone during external business dealings.

5. Anti-Bribery

Partners shall not directly or indirectly offer, promise, or give bribes to government officials, political parties, other commercial entities, etc. to obtain or retain business or attempt to improperly influence decision-makers, nor shall they accept bribes, including providing any super-standard or inappropriate gifts, entertainment, employment opportunities, etc., to obtain improper or illegal benefits.

6. Anti-Monopoly and Anti-Unfair Competition

Partners shall not engage in monopolizing markets or unfair competition alone or in collusion with other partners. Prohibited behaviors include but are not limited to: dividing markets through agreements or conspiracies, fixing resale prices, colluding in bidding, tying sales, abusing market dominance, etc., which harm the interests of end-users.

7. Cybersecurity

Partners should strictly comply with the laws governing cybersecurity and personal data protection in their respective countries and should not infringe on end-users' freedom of communication and privacy.

8. Export Control

Partners should strictly comply with applicable laws, regulations, or decisions related to export control in their respective countries, including those of the United States

III-Proper Business Practices

1. Truthful Provision of Information

Partners must ensure that all materials provided to the Company are truthful, legal, and valid. If any third-party confidential information is involved in the materials,

partners must guarantee that they have obtained authorization from the third party. Partners must also ensure that all information provided to the Company, including but not limited to orders, payment applications, important matters, etc., is true, accurate, and complete.

2. Prohibition of Revenue Fraud

Partners are prohibited from assisting Company employees in confirming false revenue by means such as false projects, inflated customer demand, dual contracts, and providing false signing documents, and deliberately delaying the confirmation of revenue. Partners are also prohibited from forging the Company's seals or official documents in any form.

3. Legitimate Acquisition and Use of Information

Partners should not acquire or use others' business secrets or other confidential information through any illegal or unethical means, including but not limited to collecting or receiving their proprietary or third-party confidential information from competitors' employees or other parties in inappropriate ways.

4. Cooperation with Auditing

Partners shall not conceal any information that may affect the interests of the Company. To ensure that partners strictly comply with this Code, they need to cooperate with the Company's auditing.

5. Prohibition of Unauthorized Commitments

Partners are prohibited from making unauthorized commitments to end-users or any third parties. If partners find that any Company employee has made unauthorized commitments to them, they should directly refuse and report to the Company. Partners shall bear any losses caused by unauthorized commitments or failure to refuse an employee's unauthorized commitment independently. If it causes any loss to the Company, the partner and the Company employee who made the unauthorized commitment should compensate the Company.

To effectively prevent unauthorized commitments, partners should be aware that the Company will not perform any terms beyond the content of the agreement/order signed by both parties.

6. Prohibition of Defamation

Partners should adhere to the principle of honest operation, refrain from defaming or discrediting the reputation of the Company, and refrain from defaming or discrediting

the reputation of competitors. Partners are prohibited from making false or misleading statements about competitors or their products and services.

7. Prohibition of Bribery of Mobvista Employees

Partners are prohibited from bribing or providing improper benefits to Company employees in an attempt to obtain undue benefits or maintain cooperation with the Company. This includes but is not limited to cash, securities, payment certificates exceeding legal or Company limits, valuable items, high-value cultural gifts, travel, high-standard receptions, etc. This provision also applies to the family members and relatives of Company employees.

8. Prohibition of Affiliation

Partners are prohibited from allowing Company employees and their family members to hold shares. If a Company employee or their immediate family member is working for a partner as an employee, consultant, director, executive, shareholder, etc., the partner should report to the Company in a timely manner. If there is a legal affiliation between the partner and a shareholder, director, general manager, other key decision-makers, or their relatives of a customer involved in a Company project, the partner should avoid cooperating with the customer.

9. Intellectual Property and Confidential Information

Partners should respect the Company's intellectual property rights, and shall not disclose any confidential information obtained during normal transactions with the Company without permission.

IV-Compliance Management

1. Establishment of Compliance System

The Company encourages partners to establish their own compliance management system to ensure that partners better comply with local laws, fulfill proper business practices, and comply with Mobvista's policies.

2. Strict Control of Employees

Partners should strictly control their employees, comply with the business code of conduct established within the partner organization, and urge employees to comply with this Code.

V-Implementation

1. Consequences of Violating the Code

Any partner who violates any of the above code of conduct may be terminated by the Company directly. At the same time, the Company reserves the right to pursue all losses caused by the partner's violation of this Code.

2. Complaint Channels

If partners have any questions about this Code or discover any behavior that violates this Code based on good faith and reasonable suspicion, please provide feedback to the following email address: ac@mobvista.com.

3. Mobvista's Commitment and Reminder

The Company solemnly promises to strictly keep confidential the personal information of the whistleblowers and effectively protect their legal rights, strictly prohibiting anyone from directly or indirectly discriminating against, harassing, suppressing, or retaliating against whistleblowers.

The Company reminds whistleblowers to ensure the truthfulness and accuracy of the feedback information provided. If necessary, please assist the Company in conducting internal investigations and verifications based on the feedback information. If the feedback information is clearly misleading and malicious defamation, it may lead to the immediate termination of cooperation with the whistleblower.

VI-Sustainable Development Action

1. Respect and Protect Basic Human Rights

We encourage partners to establish a human rights policy that complies with the United Nations Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, based on compliance with laws and regulations. Respect and protect basic human rights and basic labor rights.

2. Environmental Protection

We encourage partners to formulate environmental and climate strategies, respond to

carbon neutrality and net-zero emissions actions, establish scientific carbon reduction goals and measures, promote sustainable resource utilization, reduce waste, and prevent pollution. Correctly understand the impact and responsibility of enterprises on the environment, take active actions to reduce the impact and promote sustainable development.

3. Sustainable Consumption

We encourage partners to convey the concept of sustainable consumption to consumers, provide complete, accurate, and reliable product and service information (including the impact or benefits of products and services on the environment, society, health, safety, etc.), and promote responsible purchasing decisions by consumers.

4. Social Responsibility

We encourage partners to assume higher social responsibilities, pay attention to public interests and community development, care for vulnerable groups, promote social fairness, and contribute to the improvement of culture, education, health, and technology levels.

The company reserves the right to interpret its policies.

If there is any inconsistency in this Code between the Chinese and English versions, the Chinese version shall prevail.