



Code of Business Conduct and Ethics

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This Code helps ensure that Mobvista Inc. (hereinafter referred to as "the Company" or "we") complies with relevant legal requirements and commercial standards. All employees must read and understand this Code, maintain these standards in their daily work, comply with all applicable policies and procedures, and ensure that third parties related to the Company are aware of, understand, and comply with these standards.

As the principles described in this Code are of a general nature rather than exhaustive, you should review all applicable Company policies and procedures for more specific guidance. If you have any questions, please contact the Company's Internal Audit and Supervision Department.

I-Purpose

The Code contains general policies for the Company and its subsidiaries in conducting business. We designed this Code to prevent improper behavior and strive to enhance:

- Honest and ethical conduct, including appropriate handling of actual or perceived conflicts between personal and professional interests;
- Compliance with applicable laws, regulations or rules;
- Timely internal reporting of violations of the Code; and
- Accountability procedures to ensure compliance with the requirements of the Code.

II-Scope of Application

This Code applies to all directors, executives, regular employees, and third parties related to the Company (such as consultants, agents, sales representatives, distributors, and independent contractors), regardless of their employment status: full-time, part-time, consulting, or temporary employment with the Company. Some provisions of this Code apply only to the CEO, CFO, senior finance officers, vice presidents, and any other individuals who perform similar duties (individual senior employees are referred to as individual senior employees, and all collectively as senior employees). The Company has established a dedicated Internal Audit and Supervision Department. If you have any questions about the Code or wish to report violations, please contact the Company's Internal Audit and Supervision Department. Any reporting method will be protected, and any retaliatory behavior will be strictly prohibited within the

Company.

III-Anti-Corruption

The Company prohibits corruption and any form of bribery or kickback in dealings with government officials or any partners or individuals. We commit to complying with any anti-corruption laws that should be used and behavior standards prescribed by anti-corruption and anti-money laundering laws in the country where the Company conducts business. The Company has developed the *Anti-Fraud Management System*, *Red Line Behavior Accountability System*, and *Rules for the Active Submission of Gifts and Money Management* to implement internal management.

Proper hospitality will be considered compliant business conduct. Proper hospitality is a welcome courtesy that is viewed as establishing business relationships and understanding between business partners. However, objectively reasonable business conduct cannot compromise on any form or standard of hospitality.

It is the responsibility of employees to make reasonable judgments on this matter. As a general rule, employees may accept or offer hospitality to business partners, customers, or suppliers only if the hospitality complies with applicable laws (including but not limited to the *Criminal Law of China and the Anti-Unfair Competition Law of China*), internal company policy provisions, is of minimal value (strictly within the limits set by the Company), and does not expect any business favors in return. All gifts or entertainment expenses incurred on behalf of the Company should be reasonably explained in expense reports.

We require employees to immediately submit any gifts or benefits exceeding the Company's specified value to the Company's Internal Audit and Supervision Department and keep reasonable records for auditing purposes.

Bribery and kickbacks are illegal acts that are strictly prohibited by law. No employee may accept, give, solicit, or receive any form of bribery or kickback anywhere.

IV-Third-Party Management (Business Partners, Customers, Suppliers)

Third parties related to the Company must adhere to the highest ethical standards and regulatory requirements, and all actions should be in the best interests of the Company.

When necessary, we train third-party employees and representatives to ensure they clearly understand the Company's expectations for their behavior. We do not engage

in any form of unethical or illegal behavior with external collaborators. In conducting business dealings with third parties, we do not accept incentives such as kickbacks or bribes as compensation.

Our partners and other external third parties should be aware of the following:

- The Company implements zero tolerance for any attempt to violate compliance.
- We manage our own business in accordance with applicable laws and regulations.
- We commit to ethical cooperation with all partners (including customers, competitors, colleagues, shareholders, suppliers, governments, and regulatory agencies) and comply with all internal and external regulations.
- We strive to establish and maintain the trust and respect given to us by our customers, consumers, business partners, suppliers, and shareholders.

V-Conflicts of Interest and Insider Trading

Conflicts of interest occur when an employee's personal interests may or could affect the overall interests of the Company. Employees should proactively avoid behaviors that may hinder the promotion of the Company's interests or private interests that hinder employees from objectively and effectively fulfilling their duties. Overall, the following situations should be considered as conflicts of interest:

- Business competition. Employees who compete with or attempt to seize the Company's business will never be hired.
- Company opportunities. No employee may use Company assets, information, or positions to gain business opportunities for themselves. If an employee discovers a business opportunity in the Company's business process through Company assets, information, or position, the employee must first report it to the Company instead of taking it for themselves.
- Financial interests.
 - (i) If an interest has a negative impact on an employee's performance of duties or obligations or requires the employee to implement them during normal working hours, no employee may have any financial interest (ownership or otherwise) in any enterprise or entity, directly or indirectly through spouses or other family members.
 - (ii) No employee may hold private equity in a company that competes with the

Company's existence.

(iii) Employees may hold up to 5% of the shares of a listed company that competes with the Company's existence; if the shareholding exceeds 5%, the employee must immediately report to the Internal Audit and Supervision Department.

(iv) Any employee who manages or supervises the Company's business relationships may not have ownership of another company that does business with the Company. The above is not a complete list of all potential conflict of interest scenarios that may arise.

The following questions will serve as a useful guide to evaluate potential conflict of interest scenarios that are not specifically mentioned:

- Is the behavior legal?
- Is it honest and reasonable?
- Does it align with the Company's best interests?

The Company requires all employees to fully disclose any scenarios that may create a conflict of interest. If an employee questions whether they are in a conflict of interest or whether a conflict of interest may arise, the employee must immediately report it to the Internal Audit and Supervision Department. The Company may only exempt conflicts of interest.

Family members or friends may also cause conflicts of interest because they may affect an employee's objective position when representing the Company in decision-making. If an employee's family members or friends are interested in doing business with the Company, the Company must have more favorable standards, terms, and conditions for doing business with the Company compared to seeking business with unrelated parties. Employees should report any scenarios where family members or friends participate and are likely to cause a conflict of interest to the Internal Audit and Supervision Department.

In the process of discussing or conducting business with some of the Company's customers, suppliers, or business partners, we may learn significant non-public information about the Company. When certain information has not been made public but plays a significant role in investors' decisions to buy or sell a company's stock in the securities market, this information is considered insider information. When employees have any insider information, they are only allowed to discuss it at the "need-to-know" level and may not share the information with unauthorized internal or external personnel, buy or sell related securities, or encourage anyone to engage in

related securities transactions.

VI-Fair Competition and Anti-Monopoly

We require employees to strictly comply with relevant laws and regulations on competition and anti-monopoly, and encourage ethical and legal competition. Anti-monopoly and fair competition laws prohibit any behavior that restricts free trade and fair competition. Our business operates within the framework of these laws and regulations.

VII-Protection and Use of Company Assets

Employees must protect Company assets and ensure that they are only effectively applied for lawful business purposes. Theft, negligence, and waste have a direct impact on the Company's profits. Any illegal or improper use of the Company's funds or assets, regardless of personal gain, is strictly prohibited.

To protect and properly use Company assets, all employees should:

- Take reasonable precautions to prevent theft, damage, or improper use of Company property.
- Report any actual or suspected theft, damage, or improper use of Company property in a timely manner.
- Secure all electronic programs, data, communication, or written materials from unauthorized access. The use of Company assets is only for lawful business purposes. Except with prior approval from the Company, employees are prohibited from making political donations in the name of the Company. Prohibited political donations include:
 - Donating any Company funds or other assets for political purposes.
 - Encouraging individual employees to make such donations.
 - Compensating employees for political donations.

VIII-Intellectual Property and Confidentiality

Any inventions, creative works, computer software, technology or business secrets made by employees during the normal performance of their duties or while using company assets or resources shall belong to company assets.

Employees should maintain the confidentiality of information entrusted to them by the company or clients, unless disclosure is authorized or legally required. Confidential information includes all non-public information that could be used by competitors or cause harm to the company or clients if disclosed.

The company maintains strict confidentiality protection policies. During their employment, employees should comply with any and all written and unwritten provisions and policies concerning confidentiality and fulfill the duties and responsibilities applicable to them.

In addition to fulfilling their own job responsibilities, employees may not disclose, announce, or publish trading secrets or other confidential business information without prior approval from the company, nor may they illegally use this confidential information outside their job responsibilities.

Even outside the work environment, employees must remain vigilant and avoid disclosing important information related to the company, business, customers, or employees.

The employee's obligation to protect confidential information continues after termination of the employment contract for any reason until the information is publicly disclosed by the company or through reasons not attributable to the employee.

Upon termination of the employment contract or at the company's request to terminate the contract, employees shall return all property without exception, including all forms of media containing confidential information, and may not retain copies.

IX-Accuracy of Financial Reports and Other Public Information

It is the company's policy to disclose information related to business, financial status, and operating performance accurately and in a timely manner. Employees must strictly comply with all applicable standards, laws, regulations, and policies regarding accounting and financial reporting for transactions, assessments, and forecasts.

Employees should be vigilant about any inaccurate or incomplete financial reports and report them promptly. Pay special attention to:

- Financial performance inconsistent with related business performance.
- Transactions without apparent commercial purpose.

- Requests to bypass ordinary review and approval procedures.

Financial employees of the company have a special responsibility to ensure that all financial disclosures of the company are comprehensive, reasonable, and accurate. Any behavior or situation that undermines this purpose should be reported to the internal audit department.

Employees are prohibited from taking direct or indirect actions to coerce, manipulate, mislead, or fraudulently impact the independent audit of the company with the purpose of producing misleading financial statements.

X-Compliance with Laws and Regulations

All employees have an obligation to comply with the laws of the city, province, region, and country where the company operates, including but not limited to those covering commercial bribery and kickbacks, intellectual property, trademarks and trade secrets, information confidentiality, insider trading, environmental protection, occupational health and safety, false and misleading financial information, misuse of legal corporate assets, and foreign currency exchange business. Employees need to understand and comply with all applicable laws, rules, and regulations for their positions. If there is any doubt about the legality of certain behavior, employees should seek advice from the internal audit department.

XI-Discrimination and Harassment

The company is firmly committed to providing equal employment opportunities in all aspects and will not tolerate any illegal discrimination or harassment based on race, ethnicity, region, gender, age, nationality, or other protected categories.

XII-Fair Trading

Each employee shall strive to engage in fair trading with the company's customers, suppliers, competitors, and employees. No one may gain an unfair advantage through manipulation, concealment, abuse of privileged information, distortion of facts, or any other unfair trading behavior.

XIII-Environment, Safety, and Health

The company is committed to providing a safe and healthy working environment for employees. Each employee has a responsibility to comply with environmental, safety, and health regulations and provide other employees with a healthy and safe workplace.

Violence or threats of violence are not allowed.

Each employee should perform their job duties in a safe manner. If they discover any safety risks or concerns, they should report them promptly to maintain a healthy and safe working environment.

XIV-Responsible Advertising and Marketing

The company is committed to developing, marketing, and selling all products and services responsibly. The company and employees involved in advertising and marketing should strictly comply with relevant laws and regulations, truthfully, accurately, and honestly describe products or services based on appropriate facts, reject false advertising and misleading promotion. In advertising and marketing, respect religion, nationality, culture, gender, race, sexual orientation, age, disability, or minority groups, and avoid causing serious or widespread offense.

The company has developed content review standards and procedures for its internet advertising business. Relevant departments and employees should strictly comply with relevant provisions to ensure that advertising and marketing activities through the platform comply with relevant laws, regulations, and general ethical principles.

The company is committed to promoting higher ethical marketing standards in the industry and encourages customers to comply together.

XV-Whistleblower Policy

The company expects and encourages employees and individuals who have dealings with the company (such as customers and suppliers) to report any suspected improper, inappropriate, or unethical behavior within the company, including but not limited to:

- Criminal offenses;
- Violations of laws or regulations;
- Unfair trials;
- Improper, inappropriate, or fraudulent financial reporting, internal monitoring, or other financial matters;
- Violations of the company's rules, policies, or internal monitoring;
- Actions that jeopardize the health and safety of individuals;

- Discrimination or harassment;
- Actions that cause damage to the environment;
- Unethical or negligent behavior in professional, ethical, or other aspects;
- Improper conduct or unethical behavior that may harm the reputation of the group; and
- Deliberate concealment of any of the above actions.

Whistleblowers can send detailed reports (including information about events, behaviors, activities, names, dates, locations, and any other relevant data) to the designated whistleblower mailbox ac@mobvista.com. Once the audit committee receives the report, it will conduct an internal investigation or authorize the company secretary, internal audit and supervision department, human resources department, or other departments to do so based on the circumstances, and respond to the whistleblower as soon as possible if feasible (if contactable). Once there is a reasonable suspicion that the reported issue involves criminal offenses, it will be handed over to the law enforcement authorities for handling according to the law.

Whistleblowers can choose to report anonymously or with their real name. Providing personal information will help the investigation process, and such information will be kept strictly confidential. Whistleblowers who make appropriate reports under this policy will be protected from any unfair dismissal, retaliation, or unauthorized disciplinary action. Any action of harassment or persecution against a true whistleblower will be considered serious misconduct, and if confirmed, will result in disciplinary action, including termination of employment.

XVI-Complaints

The company guarantees that employees have the right to a fair and just appeal before receiving any internal disciplinary action according to the law, as well as the right not to be subjected to any form of physical punishment, inhumane or degrading treatment.

XVII-Exemptions from the Guidelines

Exemptions from this guideline will only be granted under specific cases and exceptional circumstances, which will follow applicable laws and regulations and are subject to timely disclosure to the public by the board of directors or organizations, departments, or authorized representatives designated by the board of directors.

If employees have any questions regarding this guideline, they can contact the internal

audit and supervision department. We hope that all employees will comply with these standards and take responsibility for their own actions.

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