

Code of Conduct for HKW Agents

Preface

This Code of Conduct applies to all agents conducting business activities on behalf of HKW. HKW adheres to the core principles of integrity, compliance, fair competition, respect for human rights and green sustainable operation. All agents shall strictly comply with this Code as well as all applicable laws and industry standards in their operating regions. This Code constitutes an integral part of the agency cooperation agreement. The signing of the agency authorization document by an agent signifies full recognition and commitment to the complete implementation of this Code.

Chapter 1 Business Ethics Standards

HKW requires all agents to uphold honesty, transparency and integrity in all business activities, abide by fair market transaction rules and maintain a sound and orderly industrial competition environment. The following violations are strictly prohibited:

1. Prohibition of Counterfeit and Inferior Product Operations

Agents shall not manufacture, purchase, store, sell or distribute counterfeit products imitating HKW's trademarks, appearances, models and packaging. It is forbidden to refurbish or modify inferior products and sell them as genuine HKW products, bundle counterfeits with authentic products, or mislead customers with shoddy goods.

2. Prohibition of Corruption and Commercial Bribery

Any form of bribery, solicitation of bribes, kickbacks and indirect benefit transfer is prohibited. Agents shall not provide improper benefits including cash, securities, valuables, travel arrangements, excessive entertainment and extra privileges to HKW employees, customers, government authorities, industry institutions and partner enterprise staff.

All payments to agents, suppliers, customers and government institutions shall only correspond to genuine and legitimate product payments, service fees, compliant commissions and statutory taxes. Business gifts and receptions shall not exceed local customs and legal scope, and shall be reported to HKW in writing in advance.

3. Compliant Operation & Compliance with Anti-monopoly and Export Control Laws

– Agents shall not engage in monopolistic practices with competitors or other HKW agents, including price collusion, market segmentation, customer restriction, malicious low-price dumping and joint transaction boycott. The exchange of sensitive

business information such as pricing, costs, customer lists and channel resources is prohibited.

– Strictly comply with laws and regulations concerning import and export control, customs, foreign exchange and sanction lists. Transactions with restricted countries and restricted products are forbidden. Complete records of customs declaration, trade documents and qualification filings shall be fully retained.

4. Intellectual Property and Brand Protection Obligations

Without prior written approval from HKW, agents shall not unauthorizedly use, modify or print HKW trademarks, logos, product drawings and promotional materials. It is prohibited to embezzle HKW patents, technical solutions and product parameters for personal or third-party business purposes, or maliciously register or preempt HKW-related trademarks and domain names.

5. Standardized Market Sales Order

Sales activities shall be conducted strictly in accordance with the regional and price systems stipulated in the agency agreement. Cross-region goods diversion and malicious low-price dumping that disrupt market order are prohibited. Unauthorized development of secondary distributors and transfer of agency rights are not allowed. False promotion, exaggerated product performance and forged test reports to defraud end customers are forbidden.

Chapter 2 Labor and Human Rights Management Standards

Agents shall treat all employees (full-time, temporary, dispatched and outsourced staff) equally and respectfully, fully comply with local labor laws and International Labour Organization standards, and implement the following mandatory requirements:

1. Non-discriminatory and Fair Employment

No discrimination shall be imposed in recruitment, promotion, salary assessment, training and dismissal based on race, gender, age, origin, disability, religion, sexual orientation, union membership, political affiliation or marital status. Except for mandatory legal provisions, professional skills and job competence shall be the sole assessment criteria for employment.

2. Prohibition of Forced Labor, Document Detention and Deposit Collection

Forced labor through coercion, personal freedom restriction or debt bondage is prohibited. Agents shall not force employees to pay deposits or guarantees upon employment, nor detain personal identity documents, passports or residence permits.

Employees have the right to retrieve their personal documents at any time.

3. Strict Prohibition of Child Labor and Standardized Juvenile Worker Management

The universal minimum employment age is 15 years old. If local statutory minimum working age or compulsory schooling age is higher, the local higher standard shall prevail. The minimum age of 14 years shall only apply to developing countries in accordance with the exemption provisions of ILO Convention No. 138.

Employment of persons below the minimum working age is strictly forbidden. Juvenile workers meeting legal standards shall not be assigned to high-risk, heavy physical or night shift work.

4. Protection of Employees' Rights to Association and Collective Bargaining

Respect employees' legal right to voluntarily form and join trade unions. Union representatives shall not be discriminated against or suppressed. They shall have free access to employees and workplace premises for legitimate collective bargaining activities without obstruction.

5. Salary, Working Hours and Welfare Protection

Employees' basic wages, overtime pay, social insurance and subsidies shall not be lower than local statutory minimum standards and industry benchmarks. Salaries shall be paid in full and on time without delay or deduction. Legal working hours and overtime ceilings shall be observed; overtime work must be voluntary and fully remunerated.

6. Work Safety and Occupational Health

Establish safe and compliant production, warehousing and office sites, fully equipped with protective equipment, fire-fighting facilities and emergency plans. Conduct regular safety training and hazard inspections. Prohibit unprotected operations in toxic and harmful environments, and provide timely medical treatment and guarantee for work injuries and occupational diseases.

7. Employee Data Privacy Protection

Employees' identity, salary, health and file information shall be kept strictly confidential. The collection, storage, use and destruction of employee data shall fully comply with local data security and personal information protection laws. Information leakage and trading of employee private data are strictly prohibited.

Chapter 3 Environmental Compliance Obligations

HKW adheres to ecological sustainable development and requires agents to fulfill environmental protection responsibilities throughout warehousing, processing, logistics and after-sales service chains:

1. Strictly abide by environmental laws and regulations governing exhaust gas, wastewater, solid waste, noise and hazardous waste disposal. Complete environmental impact assessment, pollutant discharge and hazardous waste disposal qualification procedures as required; illegal pollutant emission is prohibited.
2. Prioritize low-pollution and recyclable packaging materials to reduce disposable consumables. Waste product parts and discarded packaging materials shall be classified and recycled compliantly; random disposal of industrial waste is forbidden.
3. Conduct regular environmental risk self-inspections and establish environmental management accounts. Cooperate fully with HKW's environmental audits, take initiative to rectify potential pollution hazards, and refrain from participating in ecologically damaging, illegal mining and illegal pollutant discharge businesses.

Chapter 4 Supervision, Training and Code Implementation

1. Full-staff Compliance Training Obligation

All management, business, warehousing, finance and field staff of agents must study this Code, complete compliance training organized by HKW and retain training records to ensure all front-line staff clearly understand compliance red lines and violation consequences.

2. HKW's Supervision and Inspection Rights

Based on mutual trust in cooperative performance, HKW has the right to conduct unscheduled compliance assessments, including requiring agents to submit business, financial, labor and environmental written documents, conducting on-site audits and random account checks. Agents shall fully cooperate without concealing, forging or destroying documents to obstruct inspections.

3. Violation Handling Mechanism

If any violation of this Code is verified, HKW has the right to take measures according to the severity, including ordering rectification within a time limit, suspending product supply, deducting performance bonds, reducing agency territories and terminating agency authorization. Agents shall bear full compensation liability for brand and economic losses incurred by HKW due to violations. Suspected illegal and criminal acts shall be referred to judicial authorities by HKW.

4. Continuous Code Update

HKW reserves the right to revise and update this Code. Updated versions will be

uniformly distributed to all agents and automatically replace the old version. Continued business operation by agents shall be deemed acceptance of the latest binding terms.

Supplementary Provisions

1. Scope of Application: This Code binds agents themselves, their subsidiaries, branches, outsourced service providers and secondary distribution partners. Agents shall transmit equivalent compliance requirements to downstream cooperative entities and supervise implementation.
2. Legal Effect: This Code is a legal supplementary annex to the agency contract between HKW and agents, with equal contractual binding force. In case of conflicts between this Code and mandatory local laws, local prevailing laws shall prevail.