

Supplier Code of Conduct

Lens Technology Co., Ltd. and its affiliated companies (hereinafter referred to as “Lens Technology”) commit to upholding high standards in labor rights, environmental responsibility, and ethical conduct. Lens Technology requires its suppliers to comply with all applicable laws and regulations of the country or region in which they operate, as well as the requirements of this Code. This Code establishes the fundamental requirements for supplier management by Lens Technology. It does not exclude or limit any responsibilities that suppliers are legally or contractually obligated to assume. In all cases, suppliers must first meet the requirements of applicable local laws and regulations; in the event of any conflict between such laws and regulations and the requirements of this Code, the more stringent requirement shall prevail. Lens Technology will evaluate suppliers’ compliance with this Code. Any violation of this Code may jeopardize the business relationship between the supplier and Lens Technology and may even result in the termination of such business relationship.

1.Environment

1.1 Environmental Permits and Reporting

All necessary environmental permits (such as discharge permits, environmental impact assessment approvals, emission registrations, permits for the transfer and disposal of hazardous waste, etc.), approval documents, and registration certificates shall be obtained, maintained, and kept up to date. Compliance with the operational and reporting requirements of the permits is mandatory.

1.2 Pollution Prevention and Resource Conservation

Pollution emissions, releases, and waste generation, as well as resource consumption (including raw and auxiliary materials, water resources, etc.), shall be reduced and eliminated at the source or through practices (For example, during the design phase, consider improving production and facility processes, substituting materials, conserving natural resources, and promoting material recycling and reuse). A pollution and resource management plan shall be implemented to monitor, measure, record, analyze, and improve the management of emissions and usage.

1.3 Waste water and Storm water Management

Waste water generated from operations, production, and sanitation facilities shall be managed in accordance with regulatory standards, including separate collection of rainwater and sewage, separate collection of clean and polluted water, and classification and collection. Monitoring facilities shall be installed at discharge

points to ensure compliance with emission standards. Where applicable, storm water discharge points shall also be monitored. Emergency facilities shall be established to prevent pollution of the aquatic ecological environment.

1.4 Waste Gas Emission Management

All atmospheric pollutants generated during production and operations that are required to be controlled by regulatory standards shall be identified, classified, collected, treated, controlled, and monitored in accordance with standard requirements.

1.5 Solid Waste Management

Solid waste generated during production and operations shall be managed in full life-cycle compliance with applicable laws and regulations. Hazardous waste shall be disposed of legally and compliantly. Suppliers shall responsibly reduce the generation and landfill volume of solid waste.

1.6 Factory Boundary Noise Management

During operations, noise impacts on the factory boundary and surrounding areas shall be avoided and minimized at the source (e.g., through design layout, procurement of low-noise equipment and facilities). Noise generated at the factory boundary during operations shall be identified and controlled. Regular monitoring and analysis shall be conducted, and noise reduction measures shall be implemented.

1.7 Soil and Groundwater

Waste water and waste liquids generated during operations, production, and transportation must be disposed of in compliance with regulations to prevent leaks, spills, or seepage and to avoid pollution of soil and groundwater. Regular hazard identification inspections shall be conducted. Soil and groundwater shall be monitored in accordance with the levels specified by local governments to avoid and minimize environmental impacts.

1.8 Control of Restricted Substances in Products

All applicable laws and regulations regarding the prohibition or restriction of specific substances (including relevant labeling) and Lens Technology's requirements shall be strictly complied with.

1.9 Energy Consumption and Greenhouse Gas Emissions

Goals and targets for energy conservation and greenhouse gas emission reduction shall be established to promote energy efficiency improvements and the development of clean energy. Regular accounting and inventory of greenhouse gas emissions shall be conducted, and relevant data shall be provided to Lens Technology as required. Suppliers shall also promote carbon emission and carbon footprint management

throughout the supply chain. Carbon emissions from Scope 1 and Scope 2, as well as significant categories of Scope 3 emissions, shall be tracked, recorded, and publicly disclosed where applicable. Cost-effective measures shall be sought to improve energy efficiency and minimize energy consumption and greenhouse gas emissions.

1.10 Protection of Forests and Biodiversity

Suppliers shall identify, measure, and assess the impact of all production activities at their operational sites on biodiversity in the site location and surrounding areas. They commit to avoiding or reducing deforestation associated with production activities, taking measures to protect forest resources, and achieving sustainable utilization of forest resources through scientific logging and reforestation. Illegal deforestation shall be avoided, high conservation value areas shall be protected, and timber and paper packaging materials shall be responsibly sourced.

2. Health and Safety

2.1 Occupational Health and Safety Management

The principle of risk-based control shall be adopted to identify, assess, and mitigate potential health and safety risks. Potential hazards that employees may encounter in the workplace (such as mechanical, electrical, high temperature, radiation, chemicals, and other energy or hazardous substances) shall be controlled through proper design, engineering controls, administrative controls, preventive maintenance, safe operating procedures, and continuous safety training. If hazards cannot be effectively controlled through the above methods, appropriate, regulation-compliant, and well-maintained personal protective equipment (PPE) shall be provided to employees.

2.2 High-Risk Operations

During operations, production, and on-site services for Lens Technology, high-risk operations such as hot work, lifting operations, working at heights, confined space entry, and temporary electrical usage must be preceded by a work permit management process. On-site supervisors shall be designated, and all applicable safety regulations, standards, and Lens Technology's safety management requirements must be strictly followed.

2.3 Machinery and Equipment Protection

Machinery and equipment purchased and used by suppliers or provided to Lens Technology shall be designed to meet safety standard requirements. Hazard assessments shall be conducted for production equipment and other machinery. Physical guards, interlocks, light curtains, emergency stops, and other safety devices shall be provided for machinery that may cause harm and must be used effectively.

2.4 Chemical Management

Chemical substances and other materials that pose risks to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, transportation, storage, use, recycling/reuse, and disposal. All products manufactured for or supplied to Lens Technology must comply with Lens Technology's "List of Control of Hazardous Substances in the Environment."

2.5 Emergency Preparedness and Response

Potential emergencies and incidents shall be identified and assessed. Emergency plans and procedures shall be established and implemented, and sufficient emergency supplies shall be equipped to ensure the capability to respond to various sudden and abnormal risks, minimizing the consequences of accidents. Contents shall include, but are not limited to: emergency reporting, notification of employees and evacuation procedures, worker training and drills, appropriate fire detection and extinguishing systems, adequate exit facilities, and recovery plans.

2.6 Infectious Disease Preparedness and Response

Infectious disease management and emergency plans shall be formulated to prepare for, prevent, and respond to potential infectious disease situations, minimizing impacts on employees and production.

2.7 Accident Management

Procedures shall be established to prevent, manage, track, and report occupational health and safety accidents and near-miss incidents. These shall include, but are not limited to:

- a) Establishing a non-punitive internal reporting mechanism;
- b) Maintaining logs to categorize, record, and track all types of accidents;
- c) Providing necessary medical treatment to employees;
- d) Investigating incidents and implementing corrective/preventive measures to eliminate similar occurrences;
- e) Assisting employees in returning to work.

2.8 Ergonomics

The impact of high physical labor on employees shall be identified, assessed, and controlled. This includes manual material handling and repetitive lifting of heavy objects, prolonged standing, and highly repetitive or forceful assembly tasks.

2.9 Working and Living Conditions

Clean toilet facilities, drinking water, clean food preparation and storage facilities, and dining utensils shall be provided to employees. Employee dormitories shall be maintained in a clean and safe condition, providing appropriate emergency exits, hot

water for bathing, adequate lighting, heating and ventilation, secure lockers for personal valuables, reasonable living space, and convenient access.

2.10 Health and Safety Communication

Appropriate workplace health and safety training shall be provided to on-site employees in their native language. Relevant health and safety information (such as Safety Data Sheets (SDS) and on-site occupational health monitoring results) must be clearly posted on-site.

2.11 Consultation and Participation

Employees shall have the right to refuse work that endangers their lives and safety without fear of retaliation. A health and safety committee or employee representative mechanism shall be established to ensure that employee opinions are fully consulted before safety decisions are made.

3.Labor

3.1 Freedom of Choice of Employment and Personal Freedom

Compliance with International Labour Organization (ILO) regulations on forced labor is mandatory. The use of forced, bonded, indentured, or involuntary prison labor is prohibited. Laborers shall not be forced to work under the threat of punishment or intimidation. Before employment, workers shall be truthfully informed of working conditions, work environment, working hours, rest and leave, wages and benefits, and labor protection measures—matters directly related to their interests. Deceptive means to obtain labor shall not be used. Employees shall not be required to submit government-issued ID cards, passports, or work permits to the enterprise or labor intermediary agencies as a condition of employment. Employees' identification documents shall not be retained, destroyed, concealed, or confiscated. Recruitment fees, deposits, or other unreasonable charges shall not be collected from employees. If already collected, they must be refunded promptly. All work must be voluntary, and employees shall have the right to resign with reasonable notice. Employees' personal freedom and freedom of movement shall not be restricted, and no form of monitoring shall be conducted for the purpose of forcing employees to provide non-voluntary labor.

3.2 Child Labor and Young Workers

No child labor shall be used in any form at any stage or in any aspect of the production process. "Child labor" refers to any person under the age of 16 (in China) or under the minimum legal working age in the country or region where the supplier provides products or services to Lens Technology; whichever is the highest among the

three shall apply. If child labor is discovered, necessary assistance and remedial actions must be provided. Minor workers shall be protected in accordance with applicable laws (e.g., maintaining a register of minor workers; they shall not be assigned to work that may endanger their health, safety, or morals; overtime work or night shifts shall not be required). Student workers and apprentices shall be protected in accordance with applicable laws and regulations.

3.3 Working Hours

Working hours shall not exceed the maximum limits prescribed by local laws. Furthermore, except in emergency or exceptional circumstances, total weekly working hours, including overtime, shall not exceed the requirements set forth in applicable laws and regulations. Employees must be granted at least one day of rest within every seven-day period, and all overtime work must be voluntary. We are committed to maintaining the physical and mental well-being of employees to ensure sustainable enterprise development. All employee attendance records, including regular working hours and overtime, must be maintained. Employees shall have the right to request leave and vacation upon providing reasonable notice.

3.4 Wages and Benefits

Wages shall be paid to employees on time, without deductions. Employee wages shall comply with applicable laws, including minimum wage standards, overtime pay, and statutory benefits. In accordance with local laws, overtime wages shall be higher than the regular hourly wage. Deducting wages as a disciplinary measure is prohibited. Payroll stubs or similar documents detailing the basis for wage payment shall be provided to employees promptly.

3.5 Humane Treatment

Supplier disciplinary policies and measures shall be clearly defined and communicated to employees. Any form of harassment, violence, or abuse is strictly prohibited. Employees shall not be threatened or subjected to cruel or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical oppression, and sexual harassment. Illegal body searches, searches targeting specific groups, or inappropriate searches by the opposite sex are prohibited. If a canteen is provided, the canteen environment and food hygiene and safety must be guaranteed in accordance with relevant regulations.

3.6 Anti-Discrimination and Harassment

Suppliers shall commit to protecting employees from harassment and illegal discrimination, fully respecting employees' religious beliefs and customs, and providing necessary accommodations for religious activities as appropriate.

Discrimination or harassment based on race, color, age, gender, sexual orientation, disability, pregnancy, religious belief, marital status, union membership, or other protected statuses in hiring and actual work (e.g., promotion, rewards, training) is prohibited. Employees shall not be isolated from other employees or subjected to any discriminatory distinction or management. Unless explicitly required by applicable laws or reasonably necessary for workplace safety, employees or applicants shall not be required to undergo medical examinations that could be used for discriminatory purposes.

3.7 Freedom of Association and Collective Bargaining

Open and direct communication between employees and management is the most effective method for resolving workplace issues and compensation disputes. Suppliers shall respect employees' rights, including the right to freely associate, voluntarily form and join trade unions, engage in collective bargaining and peaceful assembly, and the right to refuse participation in such activities. Employees shall be able to openly communicate with management regarding working conditions without fear of retaliation, threats, or harassment.

4. Business Ethics

4.1 Integrity in Business Operations

The highest standards of integrity shall be followed in all business interactions. Suppliers shall prohibit any form of corruption, extortion, embezzlement, or similar misconduct. Monitoring and strengthening procedures shall be implemented to ensure compliance with integrity requirements. Corruption and unethical conduct are prohibited, adhering to the principles of "no bribery, no gift-giving, no seeking improper benefits through related relationships, no fraud, no cutting corners, no commercial fraud, and keeping promises."

4.2 No Improper Benefits

Providing or accepting bribes or other forms of improper benefits is prohibited.

4.3 Information Disclosure

Information shall be recorded truthfully, accurately, and completely and disclosed in accordance with applicable laws and regulations and Lens Technology's requirements. Falsifying records or making false statements is prohibited.

4.4 Intellectual Property and Trade Secrets

Intellectual property rights shall be respected, and intellectual property shall be properly protected. Business secrets, customer information, and confidential data of both parties shall be respected, and strict confidentiality measures shall be

implemented. Leakage, theft, or tampering with confidential information is strictly prohibited.

4.5 Fair Trading, Advertising, and Competition

Standards for fair trading, advertising, and competition shall be established. Suppliers must have measures to protect customer information. Anti-monopoly, anti-unfair competition, import/export, tax, and intellectual property laws and regulations shall be complied with, and business operations shall be conducted legally and compliantly.

4.6 Anti-Money Laundering

Suppliers' participation in any money laundering activities related to criminal offenses is absolutely intolerable. Money laundering refers to the process by which individuals or entities attempt to conceal illegal funds, such as stolen money, or make these funds appear legitimate. Suppliers shall adhere to all applicable laws and regulations regarding anti-money laundering. Criminal activities are not permitted, and suppliers must stay away from such activities if they become aware of them.

4.7 Confidentiality of Identity

An effective communication mechanism should be established to protect whistle blowers and ensure the confidentiality of their identities. Employees shall be able to report any issues in a safe environment without fear of retaliation, dismissal, discrimination, harassment, blacklisting, intimidation, or any other form of punishment.

4.8 Public Opinion and Media

Suppliers shall establish mechanisms for the prevention, reporting, and response to major incidents, negative public opinion, and stakeholder complaints. In the event of or potential occurrence of major environmental pollution, safety accidents, labor disputes, human rights incidents, food safety incidents, mass incidents, abnormal deaths, or other events that may affect Lens Technology's reputation and supply chain stability, suppliers shall promptly take control and remedial measures and notify Lens Technology within 24 hours.

4.9 Responsible Mineral Sourcing

Suppliers shall establish a due diligence mechanism for responsible mineral sourcing. Source and supply chain due diligence shall be conducted for minerals such as gold, tantalum, tin, tungsten, cobalt, mica, and other minerals managed by Lens Technology that may be contained in products. Suppliers shall reference the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent recognized framework to identify, assess, and manage risks related to conflict, high-risk areas, severe human rights abuses,

corruption, money laundering, and funding of armed groups. CMRT, EMRT, smelter/refiner information, or other supporting materials shall be provided to Lens Technology as required.

4.10 Privacy

Suppliers shall commit to protecting the reasonable privacy expectations of all business-related parties, including suppliers, customers, consumers, and employees. When collecting, storing, processing, transmitting, and sharing personal information, suppliers shall comply with privacy and information security laws and regulations.

5.Management System

5.1 Supplier Commitment and Management Responsibility

In reference to national and international standards and the Lens Technology Supplier Code of Conduct, suppliers shall establish and continuously improve their management systems in conjunction with their actual operations. Senior management shall issue a policy statement in language understandable to employees, committing to comply with applicable laws and regulations, customer requirements, this Code, and relevant industry standards.

5.2 Risk Assessment and Management

5.2.1 Identify, assess, and control risks related to environment, health and safety, labor, quality, and ethics associated with business operations, and cooperate with Lens Technology's risk reviews. Appropriate procedural and substantive measures shall be implemented to control identified risks and ensure compliance.

5.2.2 Regular risk assessments shall be conducted. Risk assessments shall include: results of self-assessment performance, risk levels at the factory location, business relationships with Lens Technology, and results of previous audits.

5.2.3 In the event of CSR incidents involving labor, human rights, business ethics, environment, etc., Lens Technology shall be notified within 24 hours, and corresponding control and corrective measures shall be taken.

5.3 Training and Communication

CSR guidelines and various standards shall be trained to all employees, supervisors, managers, and responsible personnel. Effective communication channels shall be established to listen to opinions from employees, management, customers, and other stakeholders.

6.Upstream Supplier Management

6.1 Fully communicate the relevant contents of this Code to upstream

suppliers/subcontractors and sign agreements with them that are not lower than the requirements of this Code to ensure that all links in the supply chain comply with the requirements of this Code.

6.2 Conduct CSR management for upstream suppliers/subcontractors, including but not limited to establishing a supplier CSR management system, conducting CSR risk assessments, on-site CSR audits, and tracking and improving issues.

6.3 Formulate supplier CSR agreements and promote their signing to encourage suppliers to strengthen social responsibility management and ensure continuous compliance and improvement by upstream suppliers.

6.4 CSR shall be treated as a necessary condition or threshold standard when certifying and selecting new suppliers. If a new supplier fails to meet the requirements, cooperation shall not be established.

6.5 Promote and assist suppliers in improving their CSR awareness and capabilities to jointly promote the sustainable development of the industrial chain.

6.6 Lens Technology has the right to require suppliers to provide relevant records, conduct self-assessments, accept on-site audits, or undergo third-party audits. For major nonconformity, suppliers shall formulate corrective action plans and rectify them within a specified time limit. If suppliers refuse to rectify or commit major violations of laws and regulations, Lens Technology may suspend, restrict, or terminate cooperation.