

The ESG Policy of Huntwell Technology Corp.

February 2, 2026

Huntwell Technology Corp. (hereinafter referred to as Huntwell or the Company) fulfills corporate social responsibility, attaches importance to the rights and interests of stakeholders, strengthens high added value while pursuing sustainable operation, and cultivates the Company's sustainable competitiveness. In order to promote sustainable operations in accordance with common norms and standards for global operating bases and employees, Huntwell integrates international advocacy trends, local legal requirements, self-promoting goals and other different norms to establish sustainability policies. The content of the policy summarizes the Company's governance, social, environmental and other related concepts into specific guiding principles for implementation, guiding employee behavior, and meeting the expectations of all stakeholders.

The ESG policy of Huntwell Technology Corp. is based on the [Code of Conduct of the Responsible Business Alliance \(RBA\)](#), the [Social Accountability 8000 Standard](#), the [UN Global Compact](#), the [UN Universal Declaration of Human Rights](#), the [UN Guiding Principles on Business and Human Rights](#), the [ILO Conventions](#), the [ILO Declaration of Fundamental Principles and Rights at Work](#), and the [OECD Due Diligence Guidance for Responsible Business Conduct](#), applicable to Huntwell Technology Corp. and all its contractors and supply chains, ensuring that the Company promotes sustainable development while fulfilling its responsibilities.

The Code is made up of five sections:

Sections A, B, and C: Standards for Labor, Health and Safety, and the Environment, respectively.

Section D: Standards relating to business ethics.

Section E: Standards relating to information and communication security.

Section F: Elements of an acceptable system to manage conformity to this Code.

A. Labor

Huntwell fully complies with all requirements set forth in the RBA Code of Conduct and Social Accountability 8000 Standard. The Company upholds the spirit of the human rights conventions of the "UN Universal Declaration of Human Rights," "The UN Global Compact," and "Declaration of Fundamental Principles and Rights at Work" of International Labor Organization, ILO. Huntwell establishes a Human Rights Policy to raise awareness of human

rights among internal personnel and stakeholders, and to prevent any acts that may infringe upon or violate human rights. Huntwell commits to respecting the human rights of all workers and treating them with dignity and equality. This policy applies to all direct and indirect suppliers, as well as all types of labor, including temporary workers, migrant workers, students, contract workers, directly hired employees, and any other forms of labor. In alignment with the principles of protection, respect, and remedy, we take actions consistent with the “OECD Due Diligence Guidance for Responsible Business Conduct.” Huntwell proactively implements human rights due diligence processes, identifies and assesses relevant human rights, and establishes accessible and confidential internal grievance mechanisms to ensure the effective implementation of this policy. Huntwell also requires our business partners and suppliers to commit to upholding the spirit and fundamental principles of human rights.

Labor Standards

- (1) **Prohibition of Forced Labor** Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers’ dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers’ contracts. The Company shall maintain documentation on all leaving workers. Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay employers’ agents or sub-agents’

recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

- (2) **Young Workers** Child labor shall not be used in any stage of manufacturing. The term “child” refers to any person under the age of 16, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. The Company shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable laws and regulations. The Company shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. The Company shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation shall be provided.
- (3) **Working Hours** Working hours shall not exceed the maximum set by local law. Further, a work week shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed to have at least one day off every seven days.
- (4) **Wages and Benefits** Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.
- (5) **Non-Discrimination / Non-Harassment / Humane Treatment** The Company shall commit to maintaining a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. The Company shall not engage in discrimination or harassment based on

race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

- (6) **Freedom of Association and Collective Bargaining** The Company shall foster open communication and direct engagement between workers and management, allowing workers to share ideas and concerns regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with local law, the Company shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

B. Health and Safety

Huntwell values every employee and regards workplace safety and worker health as core values. We require and ensure that all contractors and suppliers adhere to and comply with our health and safety policy and standards.

Health and Safety Policy

- (1) Follow the local safety and health regulations and standards, actively pay attention to global safety and health issues, assess risks in advance, and build a good working environment.
- (2) Construct a Safety and Health Management System, adopt strict safety and health control measures, and continuously review and improve to reduce occupational disasters.
- (3) Organize safety and health education and training according to the plan to deepen the awareness and responsibility for safety and health for all employees.
- (4) Strengthen safety and health education through cooperation and publicity with

suppliers and contractors, to jointly reduce occupational safety risks.

Health and Safety Standards

- (1) **Occupational Health and Safety** Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.
- (2) **Emergency Preparedness** Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.
- (3) **Occupational Injury and Illness** Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. The Company shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.
- (4) **Industrial Hygiene** Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. The Company shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. The Company shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational

materials about the risks associated with exposure to workplace hazards.

- (5) **Physically Demanding Work** Worker exposure to hazards associated with physically demanding tasks and ergonomic risk factors—including manual material handling, heavy or repetitive lifting, highly repetitive or forceful operations and assembly tasks, as well as musculoskeletal injuries or disorders caused by improper working postures or excessive working hours—shall be identified, evaluated, and controlled.
- (6) **Machine Safeguarding** Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.
- (7) **Sanitation, Food, and Housing** Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the facility/factory and/or via a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.
- (8) **Health and Safety Communications** The Company shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

C. Environmental Protection

Huntwell is committed to innovating research and development to create maximum value for customers, and actively pays attention to global climate change trends as a corporate citizen at the same time, takes environmentally friendly actions, and continues to improve energy resource consumption efficiency, waste management and pollution prevention and control performance. In addition to deepening all employees' awareness and responsibility for environmental protection, we also actively cooperate with customers and suppliers to jointly

establish a green and sustainable supply chain.

Environmental Policy

(1) Compliance with Laws and Regulations, Prevention of Risks

Actively pay attention to global climate change trends, assess related risks and opportunities, conduct management and prevention in advance to grasp the development of laws and regulations, and ensure that operations comply with domestic and foreign environmental laws and regulations, such as EU RoHS, WEEE, and REACH; uphold the principle of clean production and strictly implement product and environmental management, build a green product platform and organize green supply chain management to meet customer requirements.

(2) Energy-saving, Carbon-reduction, Circular Innovation

In response to global carbon reduction actions aimed at limiting global warming to within 1.5 degrees Celsius, the Company shall formulate policies and set goals for reducing resource use (water, energy, carbon emissions, and waste). The procurement of renewable energy shall be integrated progressively into the Company's carbon reduction strategy and implemented accordingly to minimize the climate impact from company operations. Resources shall be invested to promote effective energy and water conservation and maximize the efficiency of resource usage. Carbon emissions shall be reduced through green manufacturing processes and innovative technologies. Continuous improvement shall be pursued in waste and pollution management performance to prevent contamination of water, air, and land, with every effort made to minimize adverse impacts on human health and the environment. Emissions and waste shall be reduced throughout all production stages, thereby achieving the goals of sustainable development and resource recycling and reuse.

(3) Green Products, Environmentally Friendly

Advance the environmental protection design of products, restrict the use of toxic and hazardous substances, and select environmentally friendly materials, such as plastic cases that comply with EU RoHS and are free of brominated flame resisting agents. The energy consumption design of the product conforms to the requirements of international energy labels, such as Energy Star, and achieves lightweight packaging, minimized material types, and optimized volume. Under the premise of meeting customer requirements, encourage the use of recycled raw materials and environmentally friendly materials, and reduce the use of packaging materials to reduce environmental impact.

(4) Information Transparency, Communication Initiative

Establish communication and consultation channels, disclose information related to environment, and communicate environmental policies with stakeholders. Proactively advocate and publicize sustainable issues, raise the environmental awareness of stakeholders, and leverage corporate influence to jointly promote environmental protection.

(5) Continuous Improvement, Effective Management

Establish the environmental goal regular review through the Environmental Management System, and continuously improve environmental management performance through appropriate publicity and training, implementation in daily management—in addition to deepening all employees' awareness and responsibility for environmental protection—and actively cooperate with customers and suppliers to jointly establish a green and sustainable supply chain.

Environment Standards

- (1) Environmental Permits and Reporting** All required environmental permits (e.g. discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current, and their operational and reporting requirements shall be followed.
- (2) Pollution Prevention and Resource Conservation** Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.
- (3) Hazardous Substances** Chemicals, waste, and other materials posing a hazard to humans, or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.
- (4) Solid Waste** The Company shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.
- (5) Air Emissions** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from

operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone- depleting substances shall be effectively managed in accordance with the “Montreal Protocol” and applicable regulations. The Company shall conduct routine monitoring of the performance of its air emission control systems.

- (6) **Materials Restrictions** The Company shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.
- (7) **Water Management** The Company shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. The Company shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.
- (8) **Energy Consumption and Greenhouse Gas Emissions** The Company shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. The Company shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.
- (9) **Biodiversity and No-Deforestation** The Company commits that its operational activities do not involve any form of forest destruction or deforestation, and avoids operating in or near nationally critical biodiversity areas. Moreover, the company requires all contractors and supply chain partners to avoid engaging in any type of deforestation activities or operating near nationally critical biodiversity areas. If operational activities are located near such areas, the company shall comply with relevant national regulations, conduct environmental impact assessments, and implement appropriate preventive, mitigation, and restoration measures to minimize ecological impacts, thereby collectively protecting biodiversity.

D. Ethics

Upholding honesty, transparency, and responsible business philosophy, the Company is committed to establishing a corporate culture of honesty and integrity, complying with relevant laws and regulations, and establishing good corporate governance and risk control mechanisms, and to implement these truthfully in the internal management and business

activities to eliminate behaviors violating the code of business ethics and create a sustainable business environment. The Company and its representatives shall uphold the highest ethical standards, including the following:

- (1) **Business Integrity** The highest standards of integrity shall be upheld in all business interactions. The Company shall adopt a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, embezzlement, illegal political contributions, improper charitable donations or sponsorships, and the prevention of infringements on trade secrets, trademark rights, patent rights, copyrights, and other intellectual property rights, as well as the prevention of harm caused by products or services to stakeholders.
- (2) **No Improper Advantage** Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.
- (3) **Disclosure of Information** All business dealings shall be transparently performed and accurately reflected on company's business records. Information regarding company's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- (4) **Intellectual Property** Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.
- (5) **Fair Business, Advertising and Competition** Standards of fair business, advertising, and competition shall be upheld.
- (6) **Protection of Identity and Non-Retaliation** Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers shall be maintained, unless prohibited by law. The Company shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.
- (7) **Responsible Sourcing of Minerals** The Company is committed to fulfilling social and environmental responsibilities jointly with our suppliers. We support and adhere to the Responsible Minerals Initiative (RMI), refraining from the use of conflict minerals extracted through human rights abuses or armed coercion, particularly gold (Au),

tantalum (Ta), tungsten (W), tin (Sn), cobalt (Co), and their derivatives sourced from conflict-affected and high-risk areas. We also require our suppliers to uphold this commitment and agree to notify us and provide evidence to assist in verifying mineral sources and related production and sales monitoring processes. This is to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

- (8) **Privacy** The Company shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. The Company shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- (9) **Compliance with Laws and Regulations** Comply with the Company Act, Securities and Exchange Act, Business Entity Accounting Act, Political Donations Act, Anti-Corruption Act, Government Procurement Act, Act on Recusal of Public Servants Due to Conflicts of Interest, Listing-related Regulations or other business conduct related laws and regulations and accept the supervision of the Competent Government Agencies.

F. Information and Communication Security

To maintain the security of information in the operating environment of the Company, Huntwell is committed to fully protecting and preventing company and personal information from damage, theft, leakage, tampering, abuse, and infringement. The Company formulates Information and Communications Security Policy and shall be enforced to each relevant business functions and levels. The methodology of Plan-Do-Check-Act is adopted for promoting information and communication security continual improvement; it is preserving confidentiality, integrity, and availability of information security to give confidence to interested parties that risks are adequately managed.

Information and Communications Security Policy

- (1) All employees of Huntwell and external personnel shall abide by the Information and Communications Security Policy and relevant safety regulations. If a violation occurs, the Company will enforce the violator's legal and contractual responsibilities according to the circumstances; employees of the Company may be penalized in accordance with relevant HR protocols.

- (2) Personal identifiable information from employees, third party vendors, and customers are protected under applicable laws and regulations of privacy and personal information protection ; Personal identifiable information shall not be used until the individual's consent is obtained. All other information assets are owned by the company. The Company has the right, in accordance with applicable law, to check, store, transfer, exchange, and copy such information assets.
- (3) All employees of the Company and external unit personnel, who use any of the Huntwell's information assets, have the responsibility and obligation to prevent unauthorized access, tampering, destruction, and improper disclosure. All Huntwell information assets should be accessed and used in accordance with the Company's information security regulations.
- (4) The Company's Employees are obliged to protect trade secrets and intellectual property learned from operations. It is strictly forbidden to disclose trade secrets and intellectual property information to colleagues, manufacturers, and other personnel who are not related to the business.
- (5) It is strictly forbidden for all personnel to install, use, or download illegal or unauthorized software on the company's information assets.
- (6) In order to safeguard the Company's business-related data, the Company must properly identify each employee's job responsibilities and segregation of duties; only grant the necessary authority and information to complete the employee's work.
- (7) All personnel, Huntwell employees and its external service providers, should be alert at all times to information security incidents and violations of security policies and procedures, and should promptly notify the Company's local Information management unit in accordance with the procedures.
- (8) The Company shall establish a continuous operation plan in according with business needs and annually exercise the drill to maintain its applicability.

Maintaining Information and Communications Security is of utmost importance. All units should have a clear understanding of the Information and Communications Security policy and should follow the relevant regulatory procedures to maintain information security and sustainable operation of all of the Company's businesses.

E. Management Systems

Huntwell shall adopt or establish a management system whose scope is related to the

content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

- (1) **Company Commitment** The Company shall establish human rights, health and safety, environmental and ethics policy statements affirming company's commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.
- (2) **Management Accountability and Responsibility** The Company shall clearly identify senior executives and company representatives responsible for ensuring implementation of the management systems and associated programs, and shall establish a Social Performance Team to manage, monitor, and improve the effectiveness of sustainable operations initiatives. Senior management reviews the status of the management systems on a regular basis and is accountable for operational performance.
- (3) **Legal and Customer Requirements** The Company shall adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.
- (4) **Risk Assessment and Risk Management** The Company shall adopt or establish a process to identify the legal compliance, environmental, health and safety, labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with company's operations. The Company shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
- (5) **Improvement Objectives** The Company shall establish written performance objectives, targets and implementation plans to improve the company's social, environmental, and health and safety performance, including a periodic assessment of the company's performance in achieving those objectives.
- (6) **Training** The Company shall establish programs for training managers and workers to implement the company's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.
- (7) **Communication** The Company shall establish a process for communicating clear and

accurate information about the company's policies, practices, expectations, and performance to workers, suppliers, and customers.

- (8) **Worker/Stakeholder Engagement and Access To Remedy** The Company shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.
- (9) **Audits and Assessments** The Company shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.
- (10) **Corrective Action Process** The Company shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
- (11) **Documentation and Records** The Company shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- (12) **Supplier Responsibility** The Company shall establish a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

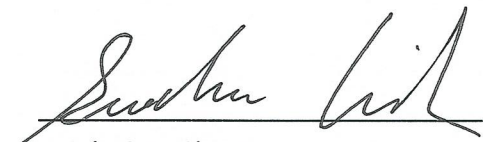
Date of Amendments

This code of conduct was established on August 1, 2025.

This code of conduct was amended on February 2, 2026.

References

1. [Responsible Business Alliance \(RBA\) Code of Conduct](#)
2. [Social Accountability 8000 Standard](#)
3. [The UN Global Compact](#)
4. [The UN Universal Declaration of Human Rights](#)
5. [The ILO Conventions](#)
6. [The ILO Declaration on Fundamental Principles and Rights at Work](#)
7. [OECD Due Diligence Guidance for Responsible Business Conduct](#)
8. [The UN Guiding Principles on Business and Human Rights](#)



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Chairman

Huntwell Technology Corp.