

A statement on modern slavery

(Secret level: public)

This statement describes the actions taken by Tonly Technology Co., LTD. (Tonly Stock or Tonly) to understand all potential modern slavery risks associated with its production and operations and to take steps to ensure that its business and supply chain are free from slavery or human trafficking.

We adhere unswervingly to the highest ethical standards in our production and business activities. The most important part of this is to ensure that Tonly's suppliers and supply chains do not use slave labour or engage in human trafficking, and that slavery and human trafficking are prohibited.

Professional ethics and business code of conduct

Tonly's "Occupational Ethics and Business Conduct Specification" establishes respect for human rights as one of Tonly's fundamental principles, which must be adhered to by Tonly employees and suppliers. Tonly's "Occupational Ethics and Business Conduct Specification" expressly prohibits the use of any forced labor by Tonly's suppliers. In order to demonstrate that Tonly adheres to the latest and highest

ethical standards, it has established a Social Responsibility Management Committee directly headed by the CEO and overseen by a Management Systems Executive Committee panel.

Social Responsibility Agreement

Tonly's "Social Responsibility Agreement" sets out the minimum working environment standards and business practices that suppliers doing business with Tonly are required to adhere to, in line with the company values as set out in Tonly's "Occupational Ethics and Business Conduct Specification". The requirements, which apply to suppliers to Tonly and its local subsidiaries, include prohibitions on the use of forced labour, slavery and human trafficking. Tonly requires its suppliers to follow and ensure compliance with the "Social Responsibility Agreement".

Tonly's "Occupational Ethics and Business Conduct Specification" and "Social Responsibility Agreement" are incorporated into its policies and procedures to ensure that relevant personnel are aware and understand its requirements. It has been further clarified in the implementation guidelines, such as "Social Responsibility Management Manual", "Supplier Social Responsibility Management Norms", "Employee Recruitment Management Regulations", "Employee Complaint

Reporting Procedures" and "Regulations on the Prevention of Forced Labor Management". In support of these policies, processes and procedures, Tonly has taken a number of specific steps to avoid and mitigate the risks of forced labour, slavery and human trafficking in our own business and supply chain.

1. Supply chain

Tonly's supply chain includes its material suppliers and service providers. Tonly seeks to work with suppliers that adopt the same rigorous standards to prevent modern slavery and human trafficking and to be fair and equitable in the workplace.

Given the nature of Tonly's operations, the risk of modern slavery in the supply chain is considered low. However, Tonly is committed to taking proactive measures to prevent suppliers and agents from engaging in modern slavery in the Tonly supply chain. Tonly shall:

- For all new suppliers and other business partners conduct due diligence, to ensure that the potential of modern slavery greatly reduced.
- According to the terms of the Social Responsibility Agreement, Tonly shall have the right to on-site audit the suppliers in terms of banned forced labor, slavery and human trafficking of compliance.

- If suppliers, agents and other institutions of Tonly co-business related behavior failed to comply with the “Social Responsibility Agreement” or violation of this policy, Tonly shall have the right to terminate the relationship.
- In addition, Tonly will provide relevant social responsibility training to supplier managers and key personnel engaged in the supply chain related work of Tonly every year. The training includes identification and reduction of risk factors of slavery and human trafficking and appropriate responses.

Tonly has zero tolerance for modern slavery and does not support or intend to do business with companies involved in modern slavery or human trafficking. To the best of our knowledge, neither Tonly nor the Tonly supply chain is involved in any form of modern slavery.

2. Tonly Stock employees

The Slavery and Human Trafficking Statement applies to all Tonly employees, including subsidiaries or others acting on behalf of Tonly (collectively, the "Tonly Employees").

Tonly complies with all applicable employment laws and strives to create a workplace that is safe, healthy, inclusive, respectful and has a strong collaborative culture. The risk of slavery and

human trafficking within Tonly is limited due to the strict policies and procedures established by Tonly. To further mitigate potential risks, Tonly must:

- To strengthen internal accountability, Tonly's "Occupational Ethics and Business Conduct Specification" and "Social Responsibility Agreement" establish responsibilities related to human rights, modern slavery and human trafficking risks. In addition, Tonly has developed a strict governance and risk management processes, to identify and mitigate supply chain risk.
- Tonly has set up a variety of mechanisms, including the helpline, to report any moral issues, or potentially or actually illegal. Anyone, including Tonly employees and suppliers, can submit questions or report, publicly or anonymously, via our help line (0752-2636951) or the relevant means.
- If we through help line or any other way to learn about slavery or human trafficking charges, will be timely investigation and take measures to correct, ultimately including cancel the relationship with related parties.
- Conducting regular training, in view of ethics is the cornerstone of Tonly based on the values of the culture, all will accept all Tonly employees once a year training, understand the RBA, Tonly "Occupational

Ethics and Business Conduct Specification” expected goals and requirements of relevant laws and regulations.

3. Compliance certification

In accordance with Tonly's Code of Conduct and the requirements of relevant parties, we must uphold the human rights of workers and respect and respect each worker. Supplier shall not use or participate in any indentured or forced labour, slavery or servitude or human trafficking, and Tonly shall:

Tonly and its subsidiaries have passed human rights/ethics related certifications such as RBA, SMETA, C-TPAT and relevant customer reviews to ensure that the products, services and transportation of Tonly and its supply chain are in full compliance with all applicable laws, regulations and provisions.

Tonly Technology Co., LTD

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