

Code of Business Conduct

Chapter 1 - General Provisions

Article 1: Objective

GCL Technology Holdings Co., Ltd. (“GCL Tech” or the “Company”) is committed to conducting business in a fair and ethical manner. The company actively embraces its social and environmental responsibilities with the goal of being respected and responsible. GCL Tech has formulated this code to articulate the behavioural standards and fundamental principles that govern its interactions with various stakeholders and the core values it prioritizes when selecting business partners.

Article 2: Basis of compilation

GCL Tech's Code of Conduct is founded on internationally recognized standards and exemplary industry practices. It incorporates the United Nations Global Compact's Ten Principles, the Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the Voluntary Principles on Security and Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Article 3: Scope of application

This code applies to the company, its subsidiaries, wholly-owned companies, and holding companies. It serves as a fundamental standard for GCL Tech in project investment and supplier selection. GCL Tech will actively promote adherence to these guidelines among our business partners. Any breaches may negatively impact our business relationship, potentially resulting in the discontinuation of cooperation.

Chapter 2 - Governance

Article 4: Compliance with laws

We maintain a strong conviction that adherence to laws and regulations serves as the cornerstone for all our endeavors. This guiding principle is firmly grounded in the fundamental values of legality and compliance, necessitating unwavering observance of local laws and regulations across all facets of our operations, profound respect for

local customs, and the unequivocal avoidance of any illicit or improper conduct.

Article 5: Stakeholders' needs

We place great emphasis on the perspectives and requirements of our stakeholders and actively engage with them to gain a comprehensive understanding of their concerns and incorporate their feedback into our business operations. We are dedicated to establishing a robust, user-friendly, and efficient complaint system, complete with designated channels for stakeholder complaints and appeals, and we are unwavering in our commitment to addressing the issues brought to our attention.

Article 6: Free and fair competition

We are dedicated to upholding the principles of free and fair competition. In all our competitive endeavours, we prioritize integrity and fairness, strictly adhering to local and international antitrust and unfair competition laws. Instead of relying on unethical or illegal methods, we aim to surpass our competitors through exceptional performance. Our primary focus is on delivering high-quality, safe, and responsible products and services to our customers, while ensuring the authenticity and reliability of transaction data. We vehemently oppose all forms of commercial fraud. Our firm policy prohibits acquiring information about competitors or partners through illegal or unethical means and disseminating false information about them. Furthermore, our employees are prohibited from disclosing confidential information when communicating with competitors.

Article 7: Business Ethics, Anti-Fraud and Anti-Bribery

We have a strict policy against individuals or organizations offering cash, cash equivalents, or any other direct or indirect benefit in exchange for improper gains. We also prohibit accepting or soliciting improper benefits and will enforce severe penalties on violators. Employees are expected to refrain from engaging in illegal or potentially corrupt activities, such as kickbacks, investment returns, money laundering, secret commissions, giving or receiving gifts, hospitality, or sponsored travel.

Article 8: Conflict of Interest

We are fully committed to preventing conflicts of interest in our business operations and encourage our employees to make fair and judicious decisions. Should a conflict of interest arise, it is imperative that employees promptly report any actual or potential conflicts to the compliance management department following the established procedures.

Article 9: Insider Trading

We uphold a stringent policy against insider trading. It is unlawful to utilize insider information for trading securities or stocks, or to divulge insider information to others for trading purposes. Individuals in possession of insider information regarding GCL Tech and its affiliated companies will be subject to close monitoring, and are prohibited from leveraging this information for personal gain prior to its public disclosure.

Article 10: Property Rights

We are firmly committed to upholding the property rights of all individuals. Our organization diligently safeguards our assets from infringement while also respecting the property rights of others. We hold ourselves to the highest standards and will never violate the property rights of others. The term "property" encompasses both physical and intangible assets, including trade secrets, patents, trademarks, copyrights, technical materials, databases, customer information, salary details, and any undisclosed financial data or reports.

Article 11: Whistleblower Protection

We remain steadfast in our commitment to providing support and protection for individuals who come forward with concerns. We unequivocally prohibit any form of retaliation against those who seek clarification or express apprehensions. Our organization will diligently implement all requisite measures to safeguard whistleblowers, facilitating the establishment of channels for reporting and anonymous complaints while concurrently instituting protective measures to prevent any form of reprisal against them.

Chapter - 3 Social

Article 12: Occupational Health and Safety

We are deeply committed to prioritizing our employees' occupational health and safety as a fundamental aspect of our company. Our dedicated focus is on creating a work environment that is safe and healthy for all employees. We rigorously adhere to national and local occupational health and safety laws and regulations while upholding the principles of "prevention first, combined prevention and control, classified management, and comprehensive governance." Our management system is based on the framework of "company oversight, corporate responsibility, hierarchical management, and goal assessment," with the aim of achieving management objectives

such as "no occupational disease incidents" and "no fire or explosion incidents." We protect our employees' health and legal rights by implementing a robust occupational health and safety risk management system, strengthening emergency response mechanisms, developing employee health protection systems, and consistently providing occupational health education and training.

Article 13: Working Environment

We are dedicated to creating a supportive work environment that places a high priority on the welfare of our employees. Our primary emphasis is on fostering the physical and mental well-being of our staff. We are proactively addressing occupational health hazards and encouraging a healthy work-life equilibrium.

Article 14 Respecting Labour Rights

We are dedicated to respecting the basic labour rights of all stakeholders and have a zero-tolerance policy for any violations of these rights.

We strictly prohibit the use of child labour and any form of forced or compulsory labour while also ensuring the protection of employees' fundamental rights.

We support employees' freedom of association, right to join unions, and right to engage in collective bargaining with the company.

We are committed to providing employees with fair compensation, reasonable working hours, and safe working conditions. Additionally, we have implemented policies and controls to safeguard labour rights.

Article 15: Anti-discrimination and anti-harassment

We are dedicated to maintaining fairness and preventing bias in all recruitment and promotion decisions. Our commitment extends to providing employees with a safe and healthy work environment. We expect all employees to communicate with each other in a professional, courteous, and respectful manner.

We prohibit discrimination in the recruitment and promotion processes based on race, religion, age, nationality, gender, marital status, or pregnancy. Employees or applicants should never be subjected to discriminatory medical examinations.

We have a zero-tolerance policy for bullying, intimidation, harassment (including, but not limited to, sexual harassment and harassment based on legally protected categories), or discriminatory behaviour.

Article 16: Community engagement and development

We recognize that the success of our company hinges on the support of various

sectors of society. Accordingly, we maintain an open attitude and maintain close ties with the community, always striving to offer assistance as effectively as possible. Through our commitment to corporate social responsibility, we actively engage in public welfare activities, including rural revitalization, charitable donations, and community outreach. Our focus is on marginalized groups, such as left-behind children, financially challenged college students, and students with special needs, with the aim of extending warmth and care.

Article 17: Pay taxes by the law

We are fully committed to strictly adhering to the laws and regulations of the country or region in which we operate. It is our duty to fulfill our tax obligations in compliance with the law, encompassing various taxes, fees, and licensing fees.

Article 18: Responsible political participation

We adhere to the principle of responsible political participation. When our employees engage in political activities, they must comply with local laws and regulations and ensure that such activities do not harm the company's interests.

Article 19: Responsible sourcing

We hold our suppliers to high ethical, safety, health, environmental, and labour standards that are in line with those of GCL Tech.

We actively advocate for the integration of ESG factors into supply chain management and implement sustainable development risk management within the supply chain. To ensure suppliers adhere to ESG practices, we conduct ESG reviews and set clear management requirements for labour rights, occupational health and safety, environmental protection, and conflict minerals. This systematic approach helps standardize and streamline ESG management and supports the sustainable transformation of the industry chain.

Chapter - 4 Environment

Article 20: Environmental and ecological protection

We fully comply with the environmental protection laws and regulations of the regions in which we operate and with government oversight requirements to minimize any potential negative effects of our production and business activities on the environment. We are committed to advocating for environmental protection and

promoting the implementation of ecological restoration projects, with the goal of reducing the environmental impact of our activities.

We strive to improve the overall utilization of energy and water resources by innovating management practices, optimizing production, using environmentally friendly materials, and promoting resource conservation, recycling, and circular use.

We closely monitor the environmental management practices of our suppliers and include requirements promoting green supply chains, energy conservation, consumption reduction, and carbon emission reduction into our suppliers' codes of conduct. We insist that all suppliers follow strict environmental protection legal standards and international regulations for their production activities to minimize the impact on the environment. Additionally, we consider the environmental management practices of our suppliers as an important evaluation criterion and encourage them to work together in building a green and sustainable industrial chain.

Article 21: Climate Change

We actively address climate change challenges and fully support the goals of global climate agreements.

We adhere to international standards and regularly verify carbon emissions for key products at both operational and value chain levels. Additionally, we continuously enhance our carbon emissions inventory and audit mechanisms. To lay the foundation for the company's energy-saving and emissions-reduction planning and implementation, we implement dual control measures for energy efficiency and carbon emissions.

We are dedicated to promoting the certification of product carbon footprints, with a focus on evaluating carbon emissions throughout the product lifecycle as a key aspect of our carbon reduction efforts.

We strive to use production processes and raw materials with minimal environmental impact, and actively seek out effective methods and technologies for energy conservation and emissions reduction. Our goal is to collaborate with partners across the industry chain to achieve joint reductions in emissions.

Chapter 5 – Appendix

Article 22: Interpretation

The GCL Tech Sustainable Development Center is ultimately responsible for interpreting these guidelines.