

Corporate Code of Conduct

* Hangzhou Myron International Logistics Co., Ltd. hereinafter referred to as “Hangzhou Myron”

It is essential that the highest standards of conduct and integrity be observed in all our dealings with our fellow employees, shareholders, customers, suppliers, business partners and professional advisers, along with government officials and the general public. To further this objective, Myron Logistics Ltd (“Hangzhou Myron”) has created this Corporate Code of Conduct (this “Code”).

This Code seeks to:

- 1、 Promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest
- 2、 Promote compliance with applicable governmental laws, rules and regulations
- 3、 Promote the protection of Hangzhou Myron assets
- 4、 Promote fair dealing practices
- 5、 Deter perceived or actual wrongdoing
- 6、 Ensure and encourage compliance to this Code

The broad areas covered in this Code are:

- PROPERTY

- 1、 Confidential Information
- 2、 Data Protection
- 3、 Email & Internet Use
- 4、 Intellectual Property
- 5、 Theft & Fraud

- PEOPLE AND CONDUCT

- 1、 Conflicts of Interest
- 2、 Outside Employment

- 3、 Employee Relations
- 4、 Fair Dealings
- 5、 Bribes
- 6、 Gifts, Hospitality & Entertainment
- 7、 Hospitality & Entertainment
- 8、 Competition (Antitrust)
- 9、 Health & Safety
- 10、 Compliance with Laws

- FINANCE

- 1、 Stocks & Securities
- 2、 Recording Transactions & Payments
- 3、 Trade Sanctions
- 4、 Anti-Money Laundering and Counter-Terrorism Financing

No document, however detailed, can provide answers to every question or address every circumstance. This Code is therefore neither exclusive nor comprehensive. It seeks only to provide a high-level picture of what integrity and ethics mean to the Hangzhou Myron and a roadmap to help navigate through some of the more common ethical issues. More guidance is available through related corporate policies and procedures on the Bridge, your manager or by contacting the Hangzhou Myron Ethics Reporting Resource (further details of which are set out below) or the Legal Department.

From time to time, changes in the business context or regulatory environment will create a need for new principles, standards or guidelines. This is therefore a ‘living document’, subject to change without notice. Hangzhou Myron reserves the right to amend or terminate this Code or any of the related policies addressed herein at any time for any reason.

As employees of the Hangzhou Myron, you are expected to understand and abide by the principles and standards outlined in this Code and the supporting corporate policies and procedures. You are also expected to:

- Behave and carry yourself in an honest and ethical manner

- Understand and abide by any other business conduct guidelines that may apply in your own region
- Comply with all applicable laws and regulations, whether or not specifically addressed in this Code
- Have an understanding of the Hangzhou Myron policies and the laws and regulations that apply to your specific role
- Ask questions if you are unsure of the appropriate course of action

Question and immediately report business and individual practices and behaviors that undermine the expectations, principles and standards in this Code. Members of the management team should model appropriate conduct and practices and ensure that the employees they supervise understand the Code. Managers should also exercise good judgment and appropriate use of their influence and authority in ensuring employees' adherence to this Code.

GENERAL PRINCIPLES AND STANDARDS OF CONDUCT:

Hangzhou Myron is committed to maintaining the highest standards of ethical conduct in all of its operations and activities. Our business success and relationships are built upon a culture of excellence and commitment, which in turn rest on the foundations of integrity, trust and respect for the individual and adherence with the law. The principles of conduct are further explained below:

- PROPERTY

1、 Confidential Information

Employees must protect the Hangzhou Myron confidential information, as well as non-public information entrusted to the Hangzhou Myron Group by employees or current or potential customers, vendors, suppliers, and other business partners. Confidential information includes such things as pricing and financial data and information, research and development data, business plans and strategies, internal communications (e.g. emails), customer names/addresses, contracts, business and marketing strategies, and personnel data. Employees must not disclose confidential and nonpublic information without a valid Hangzhou Myron Group business purpose and proper authorization.

Confidential information of the Hangzhou Myron should be disclosed within the Hangzhou Myron only on a need-to-know basis and in accordance with Hangzhou Myron policy. Confidential information should not be disclosed outside the Hangzhou Myron except when required by law or when necessary to further the Hangzhou Myron's business activities and in

accordance with Hangzhou Myron policy.

Information from our current and potential customers, vendors, suppliers and business partners must also be handled appropriately. All terms and conditions contained in our contracts with such parties pertaining to the use and management of confidential information provided by them to us must be adhered to, so as to ensure that we do not breach our contractual obligations.

The obligation to treat the Hangzhou Myron confidential information as such shall continue to exist even after termination of the employment relationship. The Hangzhou Myron shall also take measures against the unauthorized disclosure and misuse of the Myron trade secrets.

2、Data Protection

Hangzhou Myron supports the goals of: (i) adherence to general privacy standards and compliance with applicable privacy laws, and (ii) the promotion of the free movement of data to enable the Hangzhou Myron to conduct business operations (assuming that, in doing so, goal (i) is not compromised). In support of these goals, the Hangzhou Myron has enacted a Global Privacy Policy which applies to all personal data collected, processed, retained, used and/or disclosed by the Hangzhou Myron. Hangzhou Myron complies with the data protection laws applicable in the countries where it conducts business. The Hangzhou Myron has also appointed Personal Data Protection (PDP) Officers for data privacy issues.

Employees who handle personal data of others must act responsibly and act in accordance with applicable laws and any relevant contractual obligations; collect, process, use and retain such information only for legitimate Hangzhou Myron business purposes; limit disclosure and access only to those who have a legitimate Hangzhou Myron business purpose or authority to access the information; take the necessary security measures to prevent unauthorized access, and promptly report any possible data privacy breaches or risks to the PDP Officer.

3、Email & Internet use

In order to protect the interests of the Hangzhou Myron network and our fellow employees, the Hangzhou Myron reserves the right to monitor or review, with or without notice, all data and information contained on an employee's Hangzhou Myron -issued computer or electronic device, the use of the Internet or the Hangzhou Myron's intranet, as well as any other asset or property owned by the Hangzhou Myron or used on the Hangzhou Myron's premises for Myron business, subject to applicable laws and regulations.

Hangzhou Myron will not tolerate the use of the Hangzhou Myron's email and internet to create or send material or content that is malicious, defamatory, vulgar, obscene, threatening, intimidating, or harassing, including but not limited to posts on social media networks. Employees should exercise care, caution and etiquette in sending e-mail messages at all times.

4、Intellectual Property

Employees shall protect and respect the intellectual property rights of the Hangzhou Myron and third parties, including trademarks, service marks, patents and copyrights, among others. Employees must strictly adhere to all relevant laws and regulations regarding the use and duplication of all intellectual property and take appropriate measures to safeguard the intellectual property of the Hangzhou Myron. Third party intellectual property provided to the Hangzhou Myron may only be used for official Hangzhou Myron business purposes and only after the Hangzhou Myron has secured the rights to its use. Third-party computer programs or software which are provided as productivity tools for employees to perform their jobs shall not be duplicated without authorization. Any unauthorized use or duplication may be a violation of intellectual property laws and can result in civil and criminal penalties for the employee involved in its use or reproduction.

5、 Theft & Fraud

Theft of Hangzhou Myron funds or property is a criminal offense. Employees should use Hangzhou Myron property, resources, and information only for legitimate Hangzhou Myron business purposes and protect them from theft, loss, damage or misuse. Intentional concealment, alteration, falsification or omission of information for the employee's personal benefit or the benefit of other individuals amounts to fraud. All instances of theft and fraud should be reported immediately. It is the Hangzhou Myron's policy to ensure that instances of theft and fraud are promptly investigated, appropriate disciplinary action taken and, where appropriate, prosecuted.

● PEOPLE AND CONDUCT

1、 Conflicts of Interest

All employees must act in the best interest of the Hangzhou Myron in the performance of their job. Employees should avoid any relationship, influence or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when acting on behalf of the Hangzhou Myron. A conflict of interest occurs whenever an employee's private interest has the potential to interfere with the Hangzhou Myron's interests. Employees must not perform services for, or have a financial or material interest (except for genuine investments in companies listed on any stock exchange) in a company that is/may be a supplier, vendor, customer or competitor of the Hangzhou Myron, including any interest that compromises or might appear to compromise the objective assessment of the benefits to the Hangzhou Myron. Examples of potential conflicts include contracting with a supplier managed or owned in part or in full by an employee, a relative or close friend; working independently as a consultant to a supplier or customer, or running a private business of your own in the same industry. Employees must disclose to their managers any situation that presents the possibility of a conflict of interest between the employee and the Hangzhou Myron. Disclosure of any potential conflict is the first step to remaining in full compliance with this Code.

Unless notice has been given and written consent obtained, no supplier, vendor or professional

adviser whose spouse or immediate relative is an employee of the Hangzhou Myron shall be engaged to perform services of any nature for and/or on behalf of the Hangzhou Myron.

2、 Outside Employment

Employees shall not engage in outside work or perform services for a customer, vendor, competitor, or supplier of the Hangzhou Myron under any circumstance. Employees shall not engage in any outside work or undertake any office or activity if such work, office or activity lessens the employee's efficiency, alertness, interest, or productivity at the Hangzhou Myron or if it impairs or might appear to impair the independence of judgment that they are required to exercise on behalf of the Hangzhou Myron .If an employee wishes to engage in outside business activities other than the restricted ones described in the preceding statements, the employee must discuss the situation with and get written approval from his/her line manager. In the event of any doubt or concerns, employees should notify the Human Resources Department and seek clarification on whether prior approval is required.

3、 Employee Relations

All employees shall be of legal employable age or over the age of completion of compulsory education, whichever is higher. Hangzhou Myron acts in accordance with all applicable laws and regulations relating but not limited to wages, working hours, conditions and prohibition on child labor.

Hangzhou Myron is committed to providing a work environment that is conducive to optimal work performance and good work ethics, and that is free from the tensions involving matters that do not relate to the business of the Hangzhou Myron.

Hangzhou Myron has zero tolerance for slavery and human trafficking.

All employees and managers, regardless of level, shall endeavor to contribute to the following objectives:

(1) 、 Respect each employee as an individual, show courtesy and consideration, and foster personal dignity, trust and integrity.

(2) 、 Encourage each employee to contribute to his/her fullest potential, being neither advantaged nor disadvantaged by identification with any particular group, race, color, age, sex (including pregnancy), gender, sexual orientation, religion, nationality, mental or physical capacity or disability, or any other classification protected by law.

(3) 、 Provide a workplace free of harassment on such basis.

(4) 、 Provide and maintain a safe, healthy and orderly workplace.

(5) 、 Maintain a substance-free environment prohibiting alcohol and drug abuse.

4、 Fair Dealings

Hangzhou Myron values its customers, suppliers, vendors and business partners. Employees should always deal fairly with our customers, suppliers, vendors and business partners and treat them with honesty and respect. Employees must not take any unfair advantage of anyone through manipulation, concealment, deception, abuse of privileged information or misrepresentation of facts or engage in any other unfair practices.

Hangzhou Myron is committed to the highest standards of ethical conduct and integrity in all aspects of its business. It is the responsibility of every employee, regardless of level, to ensure all activities meet the highest standards of ethical conduct based on the foundations of integrity, trust, respect for individuals and adherence with the law.

5、 Bribes

It is illegal to offer, promise or pay a financial or other advantage directly or indirectly to anyone for the purpose of obtaining or retaining business or a business advantage, or to induce or reward an action or an omission to act which is illegal or contrary to the ethical or employment obligations of the recipient. Favors or gifts may be considered bribes. An offer to pay a bribe may be unlawful even if the bribe is not paid or accepted, and is a violation of this Code. Payment which is made through a third party, such as an agent or joint venture partner, to the ultimate recipient is also prohibited regardless of how the payment is characterized. Moreover, these principles apply regardless of whether the end recipient of the bribe is a government official or a private citizen, and regardless of whether the end recipient's employer is a government entity or a privately-owned entity.

Dealing through agents, joint venture partners and other third parties carries a particular risk of corruption and all exchanges of business courtesies (gifts, meals, refreshments, entertainment or other similar benefits) are expected to be carried out in accordance with the Gifts, Hospitality and Entertainment Policy. Third party suppliers should also agree in writing to the Hangzhou Myron's Vendor Code of Conduct which extends the guidelines in this Code to the Hangzhou Myron's business partners.

Employees must also not directly or indirectly solicit or receive any advantage which can influence or cause him or her to act or omit to do something which is illegal or in breach of good faith or trust and is contrary to his or her ethical or employment obligations. It is an offense even if the bribe or advantage was requested or accepted through a third party or if the advantage is for the benefit of the recipient or another person.

Particular care should also be taken when asked for money or gifts in circumstances where it is not clear that such request is legitimate. In particular, payments commonly known as 'facilitation' or 'grease' payments, regardless of how small, to perform a function that he or she is otherwise

obliged to perform, are illegal.

Employees are expected to familiarize themselves with the Recommendations on How to Deal with a Demand for Bribery or Facilitation Payment.

A violation of the Gifts, Hospitality and Entertainment Policy will subject the employee to disciplinary action and/or termination, as well as potential criminal prosecution. Any payments, gifts, favors or other benefits that are received or provided in accordance with locally accepted business practices and ethics and within reasonable and conservative bounds must be made in accordance with the Gifts, Hospitality and Entertainment Policy.

Employees are expected to report any activities which they consider or suspect may breach these requirements.

6、 Gifts

The guidelines for giving and receiving gifts can be found in the Gifts, Hospitality and Entertainment Policy.

No gift may be accepted from a customer, supplier, vendor or any other person or entity in a current or potential business relationship with the Hangzhou Myron, unless it is unsolicited and within the traditional customs in the applicable country and conforms to the reasonable ethical practices of the marketplace. Receiving gifts valued at more than USD150 is prohibited, unless approval is obtained from management.

Employees are required to declare all gifts received through the electronic Gifts, Hospitality & Entertainment Declarations System.

Employees are allowed to provide corporate gifts bearing the logo, emblem or name of the Hangzhou Myron to a customer, supplier, vendor or any other persons in a current or potential business relationship with the Hangzhou Myron. Non-corporate gifts which are reasonable and not excessive or lavish may be given with the intention to improve the image of the Hangzhou Myron or to establish or improve business relations, subject to strict compliance with the Gifts, Hospitality and Entertainment Policy. Pre-approval must be obtained prior to the giving of any gift which is greater than USD150 in value.

Under no circumstances may an employee provide any gift which is cash or a cash equivalent (e.g. a gift card or a prepaid debit card).

7、 Hospitality & Entertainment

The guidelines for giving and receiving hospitality and entertainment can be found in the Gifts, Hospitality and Entertainment Policy. As hospitality and entertainment are considered gifts, employees are required to declare hospitality and entertainment received through the electronic

Gift, Hospitality & Entertainment Declaration System.

Care should be exercised in giving or accepting business lunches, dinners, hospitality and entertainment. Such activities should be consistent with accepted business and ethical practices in the marketplace, be reasonable and not excessive or lavish. They should be for the express purpose of enhancing a business relationship, improving the image of the business, completing a business transaction (such as the signing of a contract) or as a platform to present products and services. Entertainment in any form that would likely result in a feeling or expectation of personal obligation by the recipient should not be accepted or given

Under no circumstances may any entertainment take place where the recipient is not accompanied by an employee of the Hangzhou Myron.

Similarly, it is against Hangzhou Myron policy to provide entertainment or hospitality gratuities to a recipient that can be construed to be a personal benefit unrelated to the promotion of the Hangzhou Myron. For example, whilst it would be permissible for an employee to approve reasonable travel expenses for purposes of flying a customer representative to visit the Hangzhou Myron's facilities, it would not be permissible for an employee to approve an additional 'vacation' or similar excursion after the business trip is concluded.

8、 Competition (Antitrust)

Hangzhou Myron conducts business in countries that regulate anticompetitive practices. These laws are designed to promote competition among businesses and prohibit acts in restraint of trade.

If your work brings you in contact with these areas, it is your responsibility to be familiar with the applicable laws and regulations as well as with conference agreements. Violations can produce serious consequences both for the employee and the Hangzhou Myron such as criminal penalties, large fines and civil lawsuits. These requirements are complex. More guidance is available through related policies and guidelines on the Bridge and should you require more information, please contact the Legal Department.

9、 Health & Safety

Hangzhou Myron is dedicated to maintaining a healthy and safe work environment. It is Hangzhou Myron policy to conduct our operations in compliance with applicable occupational health and safety laws and regulations and maintain safety and health practices consistent with the needs of our industry and in a manner conducive to the well-being of each employee.

10、 Compliance with Laws

Hangzhou Myron is dedicated to maintaining a healthy and safe work environment. It is Hangzhou Myron policy to conduct our operations in compliance with applicable occupational

health and safety laws and regulations and maintain safety and health practices consistent with the needs of our industry and in a manner conducive to the well-being of each employee.

It is the policy of Hangzhou Myron to comply with all applicable laws and regulations and to conduct its business in an ethical manner. The highest standards of conduct are required of our employees and all other persons who act on our behalf, including contractors, agents and consultants. Violations of these policies will result in disciplinary action, including termination of employment. You are encouraged to ask questions and seek guidance when in doubt and express concerns to your manager or appropriate contacts.

- FINANCE

- 1、Stocks & Securities

It is both illegal and unethical to engage in trading (purchase or sale) of securities of a company by a person while in possession of material, non-public information (that is, information about the company that is not publicly announced and could be expected to be important to a person making a decision to trade in such securities). Additionally, any employee who provides 'tips' regarding such non-public information to another person who bases a trade on such information is subject to civil liability and criminal penalties which could range from fines to imprisonment.

- 2、Recording Payments & Transactions

Every employee shall make and/or maintain accurate and fair records of transactions, expense accounts, time reports, leave records, books, invoices and other Hangzhou Myron records. Ensure that checks and balances are in place in work processes to provide reasonable assurances that transactions are properly authorized, approved, implemented, recorded and retained for management review and audit. No entry shall be made that conceals or disguises the true nature of any Hangzhou Myron transaction or record. The recording and retention of records shall be in adherence to the Hangzhou Myron's policies and procedures and applicable laws and regulations. If you believe that the Hangzhou Myron's books or records are not maintained within the Myron's standard practices or applicable laws and regulations, you should file a report or inform your manager or the Legal Department promptly.

- 3、Trade Sanctions

Hangzhou Myron is committed to complying with international trade and export control laws and regulations and country-specific trade sanctions affecting international transactions involving goods, services, technology and financial transactions, including but not limited to regulations issued by the China Office of Foreign Assets Control. All employees shall comply with restrictive measures and trade sanctions adopted against certain countries, governments, organizations, entities, companies, individuals or assets and shall not do any business with them in contravention of the applicable prohibitions. If in doubt, contact the Legal Department.

4、 Anti-Money Laundering & Counter Terrorism Financing

All employees shall act in accordance with the Hangzhou Myron's policy which prohibits and prevents money laundering and/or any illegal activity that facilitates money laundering or the funding of terrorist or criminal activities. Money laundering is generally defined as engaging in acts for the purpose of concealing or disguising the true source of criminally derived proceeds so that the funds appear to constitute legitimate assets or to derive from legitimate origins. Hangzhou Myron has set policies and procedures to detect and prevent suspicious activities and forms of payment and to train its staff on money laundering matters. Hangzhou Myron also has procedures in place to ensure that it does not do business with any person included on any lists of terrorists or terrorist organizations compiled by the United States or any other national or international organization. Should you suspect that a counterparty is attempting to use the Hangzhou Myron's services for illegal purposes, such as money laundering or terrorist financing, you must promptly inform your manager or the Legal Department about the situation.