

CORPORATE STATEMENT

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

HELPING EMPLOYEES CONDUCT BUSINESS WITH THE HIGHEST DEGREE OF ETHICS, INTEGRITY AND COMPLIANCE WITH LAWS AND REGULATIONS.

1、 USING THE STATEMENT OF ETHICS

This Statement of Ethics provides guidance to help employees conduct business with the highest degree of ethics, integrity and compliance with laws, regulations and management expectations. It provides details on policies, expectations and what to do if you have questions or concerns about ethical behavior.

No document, however detailed, can provide answers to every question or address every circumstance. This Statement provides a high-level picture of what integrity and ethics mean to Hangzhou Myron and a roadmap to help navigate through some of the more common ethical issues. Additional guidance is available through related corporate policies on the Intranet, by speaking with your manager or by contacting the Hangzhou Myron Ethics Reporting Resource. This Statement is not meant to be exhaustive, but is a helpful anchoring point for understanding your ethical obligations.

From time to time, changes in the business context or regulatory environment will create a need for new principles, standards or guidelines. This Statement and related corporate policies are therefore subject to change without advanced notice at any time.

2、 OUR BELIEFS

At Hangzhou Myron, we have strong values of responsibility and integrity. We are committed to an environment where open, honest communication is the expectation and not the exception. This promotes our culture of integrity and ethical decision-making. We want you to feel comfortable when approaching your supervisor or management with questions about policies or concerns about behavior inside and outside of Hangzhou Myron.

Our employees are our most important asset. We all have the right to work in a positive environment. With that right comes the responsibility of acting in an ethical manner and speaking up if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

3、 INTRODUCTION:

You should take some time to understand the standards outlined in this Statement of Ethics and the supporting company policies. You are expected to follow these principles, as well as:

Abide by any other business conduct guidelines that apply in your region

Comply with applicable laws and regulations, even if not addressed in this Statement or the supporting company policies

Ask questions if you are unsure of the appropriate course of action

Challenge business practices or individual behaviors that undermine these principles

4、 MANAGEMENT RESPONSIBILITIES

If you are a manager, you should model appropriate conduct and ensure that employees you supervise understand the Statement of Ethics. Use good judgment and appropriate use of your authority to ensure your employees adhere to this Statement. You are responsible for keeping the channels of communication open, providing an environment where employees can present their ideas candidly. If a subordinate raises a concern which requires investigation or which you are uncertain about, contact the Hangzhou Myron Ethics Reporting Resource for assistance immediately.

5、 RAISING CONCERNS & SPEAKING UP

● WHAT HAPPENS WHEN AN ETHICS CONCERN IS RAISED

If you file a report to raise an ethics concern, it is entered into a secure server and will be available only to those individuals charged with evaluating the report (who vary based on the type of concern and location of the matter).

● NON-RETALIATION

You can report violations or ask questions anonymously (if desired) and without fear of retaliation. Hangzhou Myron will take reasonable precautions to protect your confidentiality. We will not tolerate any form of retribution against any person who reports known or suspected violations.

All concerns should be reported. However, allegations relating to fraud, ethics or internal controls are more serious. Special care should be taken to report these immediately, and they will be reviewed by the Ethics Committee. Examples of such violations include:

1. Abuse of or fraud with company benefits. Deceptive actions or misrepresentation of physical conditions related to benefit plans or time off policies.
2. Antitrust activity. Conduct that prevents or restricts competition, including arrangements or discussions with competitors regarding price, boycotting suppliers/customers, allocating territories, trade allowances, marketing, production or other confidential information.

3. Breach of anti-bribery laws. Bribery of foreign officials. This can include persons employed directly or by an enterprise owned/controlled by a foreign government, as well as private persons who have responsibilities similar to government employees.
4. Confidentiality and misappropriation. Unauthorized use or disclosure of confidential company information, such as: company and customer non-public information, trade secrets, patents, trademarks, copyrights, research data, designs, unpublished financial information, marketing plans, etc.
5. Conflict of interest. Personal interest sufficient to appear to influence a person's objective exercise of official duties. Examples include inappropriate vendor/customer relations or misuse of confidential information.
6. Data falsification. Improper modification or omission of information in the company's records. Examples include misstatement or mischaracterization of revenues, expenses or assets.
7. Data privacy. Insufficient steps taken to protect against unauthorized access to personally identifiable data of employees, customers and other third parties in the company's possession.
8. Appropriating the company's property fraudulently to one's own use. Examples include intentional bookkeeping errors, misapplication of funds and mishandling of cash.
9. Environmental protection. Violation of any environmental law, regulation or corporate policy with respect to the handling and disposal of hazardous materials or the health and safety of other individuals
10. Export control violation. Violations of export control regulations, including both physical exports and deemed exports.
11. Falsification of business documents. Altering, fabricating, falsifying or forging documents, contracts or records for the purpose of gaining advantage or misrepresenting value.
12. Finance matters. Recording and analysis of financial transactions not in accordance with generally accepted accounting principles. Examples include misstatement or mischaracterization of revenues, expenses or assets.
13. Gifts and entertainment. Inappropriate offering, solicitation or accepting of items of more than nominal value from vendors, customers or other third parties.
14. Government contracts. Failure to comply regulations and contracts relating to government business.
15. Improper supplier or contractor activity. Conduct in violation of corporate policies, such as improper supplier selection based on personal gain or improper negotiation of contract awards.
16. Insider trading or other securities violations. Any infringement of securities acts rules, such as insider trading, which is the act of trading securities while in possession of material non public information about the company.
17. Misleading sales, marketing or advertisement. False or deceptive advertising, packaging, displays, promotional materials or messaging.
18. Misuse of assets or services. Use of company resources or equipment without permission for non-business reasons.
19. Safety. Failure to meet requirements needed to perform duties in a secure environment. Examples include OSHA violations, poor housekeeping and violence or the threat of

violence.

20. Theft. The act of stealing or otherwise removing company or personal property with the intent to deprive the rightful owner of it.
21. Violation of policy. Actions that are in direct violation of company policy, procedures, code of conduct or contractual responsibilities. Policy examples include non-disclosure agreements, hiring standards, safety standards, internet usage policies and corporate guidelines

6、 LEADING WITH INTEGRITY IN OUR WORKPLACE

● ALCOHOL & DRUG FREE WORKPLACE

All employees deserve a safe and healthy workplace. Therefore, we expect a substance-free work environment and prohibit alcohol and drug abuse occurring in or impacting the work environment. Subject to and as allowable under local work rules and/or applicable laws, the use, transfer, sale or possession of illegal drugs, alcohol or other controlled substances at an Hangzhou Myron facility or while conducting Myron business is prohibited.

● DISCRIMINATION & HARASSMENT PREVENTION

Hangzhou Myron will not tolerate acts of discrimination, harassment or violence.

We prohibit unwelcome verbal or physical conduct directed at employees based on race, ancestry, color, age, national origin, ethnicity, religious creed or belief, physical or mental disability, marital or familial status, legally protected medical condition, genetic information, military or veteran status, sex (including pregnancy, childbirth, breastfeeding, or related medical condition), gender (including gender identity and gender expression), sexual orientation, citizenship status, protected activity (such as opposition to or reporting of prohibited discrimination or harassment) Unacceptable practices include bias in hiring, bias in assignments, wrongful termination, bias in promotions, bias in educational decisions and unfair compensation.

Do not commit acts that harm the physical or mental well-being of other employees. This includes physical bodily harm, the threat of bodily harm, harm or threat of harm to a person's property, verbal abuse or the use of inflammatory, derogatory, unduly critical or insulting language.

● INAPPROPRIATE CONDUCT

We are committed to providing a positive work environment that is free from tensions involving matters that do not relate to the business of the company.

Regardless of your level, you are expected to contribute to the following principles:

1. Respect each employee as an individual, showing courtesy and consideration, and foster personal dignity, trust and integrity

2. Encourage each employee to contribute to his or her fullest potential, being neither advantaged nor disadvantaged by identification with any particular group, race, color, age, gender, sexual orientation, religion, nationality, mental or physical capacity or disability
3. Provide and maintain a safe, healthy and orderly workplace, free of harassment
Conduct outside of these guidelines will be considered inappropriate and handled according to the Hangzhou Myron Code of Conduct.

- **CONFLICT OF INTEREST**

All employees must act in the best interest of the company in the performance of their job. You must not perform services for or have a material interest in a company that is a supplier, customer or competitor of 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; running a private business of your own in the same industry.

If you find yourself in a situation that presents the possibility of a conflict of interest, you must disclose this to your manager.

Unless written consent has been obtained, no supplier, vendor or adviser whose spouse or immediate relative is an employee of Hangzhou Myron shall be engaged in services for and/or on behalf of Hangzhou Myron. Additional information can be found in the Hangzhou Myron Code of Conduct.

- **OUTSIDE EMPLOYMENT**

If you wish to engage in business activities outside Hangzhou Myron, you should discuss this with your manager and get written approval. Outside work is not permissible when:

1. It's for a customer, competitor or supplier of the company
2. It lessens your efficiency, alertness, interest or productivity
3. It appears to impair your independent judgment you are required to exercise on behalf of the company

- **RELATIONSHIPS WITH SUPPLIERS**

You should not engage in activity that is in violation of company policy, including:

1. Supplier selection based on personal gain
2. Improper negotiation of contract awards
3. Performing services for or having a material interest in a company that is or may be a supplier

7、 LEADING WITH INTEGRITY IN OUR MARKETS

- FAIR COMPENSATION & FAIR DEALING

FAIR DEALING

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

COMPETITION (ANTITRUST)

Hangzhou Myron conducts business in countries that regulate anti-competitive practices. These laws are designed to promote competition among businesses and prohibit acts in restraint of trade. Employees are expected to comply with all applicable competition (antitrust) laws that prohibit anti-competitive or predatory business conduct, such as price fixing and monopolization of trade.

- INTENTIONAL DISHONESTY

It is unethical to falsify, improperly modify or improperly omit information in the company's records, such as misstating or mischaracterizing revenues, expenses or assets. Employees shall not alter, fabricate or forge any part of a document, contract or record for the purpose of gaining an advantage or misrepresenting value or agree to alter the structuring of payment terms to circumvent internal approval processes.

- FINANCIAL INTEGRITY & ACCOUNTING IRREGULARITIES

You should maintain accurate and fair records of transactions, expense accounts, time reports, leave records, books, invoices and other company records. Ensure that checks and balances are in place to ensure that transactions are properly authorized, approved, implemented, recorded and retained for management review and audit.

Make no entries that conceal or disguise the true nature of a company transaction or record. The recording and retention of records shall be in adherence with the company's rules, applicable laws and regulations. If you believe that the company's books or records are not maintained within these standards, you should file a report or inform your manager or Legal immediately.

- INSIDER TRADING

It is both illegal and unethical to engage in trading (purchase or sale) of securities of a company while in possession of material, nonpublic information. Additionally, any employee who provides such non-public information to another person, who then bases a trade on the information, is subject to civil liability and criminal penalties which could range from fines to imprisonment.

- ANTI-CORRUPTION

It is illegal to offer, promise or pay a benefit to anyone under the obligation of obtaining or retaining business or a business advantage, or to reward an action that is illegal or unethical. An offer to pay a bribe is punishable even if the bribe is not paid or accepted. Payment made through a third party is also prohibited regardless of how the payment is characterized.

- ANTI-MONEY LAUNDERING

All employees shall act in accordance with Hangzhou Myron's policy that prevents money laundering and activities that facilitate money laundering or the funding of criminal activities. Money laundering is defined as engaging in acts for the purpose of concealing the true source of criminally-derived funds so they appear to be legitimate assets from legitimate origins.

We have set policies and procedures to detect and prevent suspicious activities and forms of payment and to train our staff on money laundering matters. We have procedures in place to ensure that we do not do business with persons included on lists of terrorists or terrorist organizations compiled by any national or international organization. Should you suspect that a party is attempting to use Hangzhou Myron's services for illegal purposes, you must promptly inform your manager or Legal about the situation.

- AUTHORITY TO WORK

You must be legally permitted to work for Hangzhou Myron in the country where you work, and you must meet all eligibility and permit requirements.

1、 ENVIRONMENTAL RESPONSIBILITY, HEALTH & SAFETY IN THE WORKPLACE

Hangzhou Myron is committed to providing a safe, healthy and orderly workplace. Employees shall not violate any environmental law, regulation or company policy with respect to the handling and disposal of hazardous materials or the health and safety of other individuals.

2、 PROTECTING PERSONAL & BUSINESS INFORMATION

- CONFIDENTIAL INFORMATION

You must protect the company's confidential information, which includes all non-public information such as internal communications, contracts, pricing, business and marketing strategies, financial information and personnel data. Confidential information should be disclosed within the company only on a need-to-know basis and in accordance with company policy. Confidential information should not be disclosed outside the company except when required by law or when necessary to further the company's business activities and in accordance with company policy.

- DATA PROTECTION

Hangzhou Myron supports the goals of:

1. adherence to general privacy standards and compliance with applicable privacy laws
2. the promotion of the free movement of data to enable Hangzhou Myron to conduct business operations (assuming that, in doing so, the previous goal is not compromised)

In support of these goals, Hangzhou Myron has enacted a Global Data Privacy Policy, which applies to all personal data collected, processed, retained, used and/or disclosed by Myron. We comply with the data protection laws applicable in the countries where we conduct business.

- INTERNATIONAL TRADE

Hangzhou Myron is committed to complying with international trade control laws, regulations and country-specific trade sanctions affecting international transactions. This includes, but is 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, individuals or assets.