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FAQ: Why do I need to acknowledge that I understand and will comply with this Code of Ethics?

Answer: Once a year, all Luxshare-ICT's employees, officers and directors are required to acknowledge compliance with the Code of Ethics. Before providing your confirmation you are expected to remind yourself of our values and duty to act with integrity, honesty and fair dealing.

I. Introduction

The Luxshare-ICT Worldwide Code of Business Conduct and Ethics ("Code of Ethics") is intended to guide our activities so that we can conduct our business in accordance with legal requirements and operate under the principles of fairness, integrity and transparency.

The Code of Ethics applies to employees, executive officers, directors, temporary and contract workers of Luxshare-ICT Corporation and its subsidiaries (collectively "Luxshare-ICT" or the "Company"). All of the foregoing are expected to read and understand this Code of Ethics, uphold the rules and standards set forth herein, comply with all applicable policies and procedures. In addition, we expect that those who do business with Luxshare-ICT will adhere to these standards. Because the principles described in this Code of Ethics are general in nature, you should also review all applicable Luxshare-ICT policies and procedures for more specific instructions. All policies referenced in this Code of Ethics are available through Luxshare-ICT's internal website or upon request from the Human Resources Department. General questions regarding the Code of Ethics should be directed to the Human Resources Department or the Legal Department.

Each quarterly, employees and executive officers will be asked to provide a written or electronic acknowledgment indicating their continued understanding of the Code of Ethics, which may be amended from time to time.

II. Who Enforces and Monitors Compliance with the Code of Ethics?

All managers are responsible for enforcement of the Code of Ethics within their respective departments. Any violation must be reported directly to the Legal Department, the Audit Office, violations may be reported on a confidential or anonymous basis without fear of retribution.

III. Business Activities

A. Relationships with Customers, Suppliers and Others

Luxshare-ICT's reputation and brand name have been built upon and will continue to be built upon the innovation and quality of our products and services. We strive to meet the highest standards for manufacturing quality and performance for our products. We are committed to ensuring that consumers can continue to trust Luxshare-ICT products for their reliability, quality and superior performance. To meet this goal, we must always strive to manufacture products that meet or exceed our performance and quality standards.

Our success depends upon consumer satisfaction, trust and goodwill. We recognize the importance of anticipating and assuring responsiveness to consumer needs and preferences in our products. We believe that consumer opinions, concerns and inquiries regarding our products are important sources of information. When a consumer expresses dissatisfaction, we address the problem promptly, courteously and fairly. We make every reasonable effort to sustain or regain the consumers' goodwill .

When conducting our purchasing operations, we aim to assure continuing, reliable sources of supply, also for any other of the products or services obtained through our complex supply chain required to run our business.

When you are in contact with a supplier, customer or business partner of



Luxshare-ICT, you represent Luxshare-ICT. Always act in a manner that demonstrates the highest level of integrity, honesty and fair dealing. For example:

- All potential suppliers are given fair and uniform consideration,
- Decisions shall always be based on objective criteria such as product price and quality and supplier reliability and integrity, and
- Kickbacks, bribes, unearned compensation, or similar payments of any type are prohibited. Any offer of such inducements must be reported immediately to your supervisor or the officer of the Legal Department, the officer of the Audit Office.

Honest dealing with our customers, and business partners and suppliers is essential to sound, lasting relationships.

Luxshare-ICT strives to be a contributing member of the global community. We are a citizen of each locality where we are established to do business. Like individual citizens, we have a responsibility to support the community. It is our goal to take part in projects that further the welfare of our local communities and to be a dedicated and involved citizen.

Luxshare-ICT is committed to being a partner in sustaining the environment. We comply with regulations and laws that relate to the environmental aspects of our activities, products and services. Furthermore, we strive to reduce the environmental impact of our products and activities by reviewing and setting sound environmental objectives and targets, such as limiting waste and promoting recycling.

We must always strive to serve the best interests of our stockholders by seeking to: provide growth, profitability and a fair rate of return on their investment, protect stockholder investments, provide full, fair and accurate disclosures in our public reports, and maintain our position as a global leader in our products. We believe our efforts in these areas will continue to build stockholder value.

FAQ: What are examples of a business courtesy?

Answer: Gifts, meals or entertainment, discounts, personal services, use of facilities, prizes, participation in stock offerings or any other favored personal treatment.

FAQ: What if a certain Luxshare-ICT team was invited by a customer to a sporting event to celebrate a successful year?

Answer: Tickets to the finals of sporting events, Super Bowl and other similar events (especially if lodging is included) are a significant gift which could be perceived as improper and require prior approval from the Chief

B. Gifts and Entertainment

Although business courtesies are often a customary part of doing business, the appropriateness of both giving and receiving these courtesies depends on the circumstances. Certain business courtesies are acceptable without management approval but others are never acceptable or may require approval from the Chief Legal Officer , the head of Audit Office.

(i) What is Permitted?

You may give or accept a business courtesy if it is:

- Not lavish, but customary in value (provided that, if it is a gift, it must be less than 500 RMB in value and never in the form of cash),
- infrequent,
- intended to promote goodwill and NOT intended to influence the recipient's objectivity or create an obligation,
- does not reasonably create the appearance of impropriety,
- given openly, justified,
- acceptable according to Luxshare-ICT's Business Authorization and/or procurement policies if applicable,
- acceptable under the law and under the giving and receiving companies' policies.



Legal Officer ,the head of Audit Office.

FAQ: What if Luxshare-ICT was requested to contribute 5,000 RMB as a prize offered to the lucky winner in a customer's holiday or other party?

Answer: A gift in the form of cash is never acceptable. Gift certificates are more appropriate but if the amount exceeds 500 RMB, it requires prior approval from the Chief Legal Officer ,the head of Audit Office..

FAQ: What if I am unsure whether a gift or event complies with our policy or of I have a question relating to gifts and entertainment?

Answer: When in doubt, seek guidance from the Chief Legal Officer ,the head of Audit Office.

FAQ: What if a Luxshare-ICT employee paid for the gift and did not seek reimbursement?

Answer: If the gift has any connection to Luxshare-ICT business, the rules apply even when Luxshare-ICT employee has paid for the gift and has not sought reimbursement.

FAQ: Who is a government official?

Answer: This is a very broad category that includes employees of local governments, state-owned enterprises, and certain international organizations.

FAQ: Who is a competitor?

Answer: In addition to Luxshare-ICT's traditional competitors, a competitor could be a current or prospective Luxshare-ICT customer, partner,

Invitations to infrequent business meals, events that provide relevant continuing education as a substantive component of the event, celebratory events or other business entertainment may be accepted provided that (1) the host, or a representative of the host at the appropriate level, attends the event and (2) the meal, event or entertainment is neither excessive nor creates an appearance of impropriety.

(ii) What is NOT Permitted?

It is never acceptable to give or accept a business courtesy if:

- it is a gift in excess of 500 RMB unless approved by the Chief Legal Officer , the head of Audit Office.,
- it is intended to influence a decision or may appear to influence a decision or compromise a person's judgment,
- it is given to or received from a government official in any country without prior approval from the Chief Legal Officer , the head of Audit Office. ,
- it creates the perception that the other person must reciprocate or is offered for something in return,
- it is lavish or excessive,
- it is in the form of cash, stock, options or loans,
- public disclosure would reflect adversely on Luxshare-ICT, OR
- the gift violates the law or the giving or receiving company's policy.

(iii) Political Contributions.

Political contributions on behalf of Luxshare-ICT are not permitted without prior approval from the Chief Legal Officer or the Chief Financial Officer.

(iv) Instances when Approval is Always Required.

A gift valued more than 500 RMB or any other business courtesy that does not fit into the categories mentioned above require prior approval from the Chief Legal Officer , the head of Audit Office., depending on the circumstances. If to avoid breaking protocol, you feel obligated to accept a gift that does not meet these guidelines, you are required to promptly report it in writing to the Chief Legal Officer , the head of Audit Office and to adhere to their instructions.

(v) Business Courtesies Involving Government Officials.

If a government official is involved, the risks are greater and we must ensure compliance with relevant regional or national laws and regulations and other anti-corruption laws. Contact the Legal Department prior to offering any gifts or entertainment to a government official.

Note: Certain departments (e.g. procurement) may further restrict giving or receiving gifts. Persons working in those departments must adhere to the applicable policies.

C. Competition Compliance

Luxshare-ICT is committed to competing vigorously in the marketplace.

Luxshare-ICT will always do business according to the letter and spirit of all laws that govern and promote free and fair competition. We will strictly comply with the antitrust and related competition laws of relevant region or country where applicable. We will always do business in a manner that is fair, honest, and ethical. Violation of antitrust laws is a very serious offense and could place both the Company and the individual at risk of substantial criminal penalties, civil penalties, and private

distributor, supplier or service provider that makes or intends to make available its own products or services that compete with Luxshare-ICT's.

FAQ: How should I respond if a distributor complains that Luxshare-ICT's products are offered at a very low price by one of its competitors?

Answer: You should advise that Luxshare-ICT cannot be involved in any discussions relating to such competitor's pricing or respond to any such complaint. Please report and seek further guidance from the Legal Department.

FAQ: What should I do if a competitor attempts to discuss these subjects with me? What should I do if I am not sure whether a subject is allowable to discuss?

Answer: You must end the conversation and seek guidance from the Legal Department

FAQ: What if the gift was not made to a foreign government official but to a relative of a foreign government official?

Answer: Things of value given to relatives of foreign government officials can be considered to have been given to the official and such gifts are therefore prohibited.

FAQ: How should I go about doing business with a foreign government?

Answer: Doing business with ANY foreign government requires the prior written approval of the Legal Department.

litigation.

Certain conduct involving competitors is almost always illegal around the world.

Unless you have prior approval from the Legal Department, NEVER talk with, make written or oral agreements with, or exchange information with competitors or coordinate a competitor's discussions about:

- prices (including resale prices) price levels or price changes of Luxshare-ICT products and/or a competitor's products,
- dividing up markets and/or customers with a competitor,
- limiting or reducing output or supply of Luxshare-ICT products and/or a competitor's products,
- coordinating a competitive bid process or submitting sham bids or the decision of whether or not to bid,
- not dealing with or termination of a third party (i.e. boycott), or
- pricing policies or formulas, profit margins, contract or credit terms, costs, inventories, product roadmaps, marketing plans or capacity plans of Luxshare-ICT or any other third party competitor.

These rules apply to everyday business dealings and all other settings, including trade association or other industry organization meetings. In some cases, legitimate joint ventures and licensing arrangements with competitors may permit exceptions to these rules, subject to prior review and approval by the Legal Department.

In dealing with distributors, the local laws that apply to a particular market must be followed. Please consult the Luxshare-ICT Legal Department with any questions on the laws of a particular country or region.

Luxshare-ICT gathers competitive information fairly from legitimate sources and does not engage in unfair business practices. Examples of unfair business practices are:

- Disparaging or making false statements about competitors or their products or services,
- Stealing or using a competitor's trade secrets,
- Illegally inducing customers to break contracts with competitors (as opposed to honest competition for business),
- Requiring vendors to purchase Luxshare-ICT products in order to sell products or services to Luxshare-ICT, or
- Engaging in any pricing or other practices that could defraud a vendor or others.

We do not permit any third parties with whom we deal to engage in any activities prohibited by this Policy. When questions arise, please contact Luxshare-ICT's Legal Department for guidance.

D. Anti-Bribery

Luxshare-ICT requires full compliance with any anti-corruption laws in any country in which Luxshare-ICT conducts business. Many countries in which Luxshare-ICT does business have laws that additionally prohibit the offer, provision or receipt of a bribe among private entities (i.e., not just to government officials). It is Luxshare-ICT's policy to comply with all applicable laws in the countries in which it does business. This applies to all Luxshare-ICT employees, executive officers, temporary and contract workers, sales representatives, distributors and agents. Please refer to Section III. B. (Gifts and Entertainment) for guidance on business courtesies between 7W 6()5(7) 07 01 80.77 80.76 3 27 632.74 re 07 07 04 07 07 07

is defined broadly to include gifts, travel, meals/entertainment, unjustified discounts, stock, cash, donations, shopping trips, job offers, etc. Gifts and entertainment that may be perfectly acceptable under Section III.B. above, may easily violate other global anti-corruption laws when a government official is involved.

is interpreted very broadly to include senior officials and junior employees from federal to state to local governments and international organizations, and can include military, customs, tax officials, university employees, hospital staff, employees of partially privatized enterprises (even if the government is a minority shareholder) or state-owned enterprises or companies. You can find a list of state-owned enterprises (SOEs) in a particular country via a web search (for example, "list of SOEs in China").

means that actions prohibited for Luxshare-ICT employees are also prohibited for Luxshare-ICT's consultants, sales representatives, agents, contractors, distributors or any third party doing business with or on behalf of Luxshare-ICT. Any individual representing Luxshare-ICT is not allowed to make illegal payments to Foreign Government Officials.

If you knew, or had reason to know, of a payment to a Foreign Government Official by a consultant, both Luxshare-ICT and you can be liable. Penalties include severe fines and even jail time for individuals. You will be considered to have "known" of the payment if there were hints or warnings of illegal activities (called "Red Flags") that you did not investigate. You must follow Luxshare-ICT's processes for screening customers, vendors and other business partners and always remain alert to these issues.

is also interpreted broadly and not only includes sales to government agencies, but also anything of value given to a Foreign Government Official in the process, such as payments to tax or customs officials, even when the ultimate business is NOT with a Foreign Government Official.

FAQ: What should I do if I believe that a trade-related violation has occurred or is about to occur?

Answer: You must contact Luxshare-ICT's Legal Department prior to proceeding with the export or import transaction.

" " : Please note that Luxshare-ICT's policy is that "facilitating" or "grease" payments are NOT allowed as they are almost never legal in the country in which they are made.

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FAQ: What is personal data?

Answer: Any information that can be used to identify,



track, contact or locate an individual or an individual's computer.

FAQ: What do I need to do if my brother has just started working for one of our customers and I am the sales person responsible for this account?

Answer: You must disclose the activity to the Company using the Conflict of Interest Activity Disclosure and Approval Form.

FAQ: I am part of the Company's procurement team and I was wondering if I could engage one of our vendors to perform minor tasks at my parent's apartment?

Answer: You must disclose the activity using the Conflict of Interest Activity Disclosure and Approval Form and seek prior approval from the Legal Department.

Data Policy, and all other Luxshare-ICT privacy and data protection policies and procedures applicable to your work.

G. Media Contact & Public Communications

The Chief Executive Officer has designated specific people to communicate matters regarding any Luxshare-ICT entity with the news media and the public. If you are approached for interviews or comments by the media, investors, analysts or by other external parties, you must decline comment and immediately refer such inquiries to the public spokesman from the Chairman's office.

IV. Responsibilities to Luxshare-ICT

A. Conflicts of Interest

Employees may not participate in any activities that could conflict with their responsibilities at Luxshare-ICT without approval. For example, a conflict of interest may arise when your personal interests or activities (or a person having a close personal relationship with you) appear to or may influence your ability to act in the best interests of Luxshare-ICT.

As used in this Code of Ethics, a person or persons "having a close personal relationship with you" refers to:

- your spouse,
- siblings,
- children,
- parents,
- grandparents,
- step relationships,
- in-laws, and/or
- any persons living in the same home with you.

If an activity by you (or a person having a close personal relationship with you) poses a potential or actual conflict of interest, including the conflicts specified below, you must disclose the activity to the Company using the Conflict of Interest Activity Disclosure and Approval Form to obtain the requisite management approvals, subject to any additional approvals listed below. Completed Conflict of Interest Activity Disclosure and Approval Forms will be kept on file in the Legal Department.

1. Outside Employment and Inventions

An employee may not work for a supplier, reseller, customer or competitor while working for Luxshare-ICT. As to other third parties, you should not do any work for and/or provide assistance to, any third party that may adversely affect your performance or judgment on the job. Furthermore, an employee may not be involved, without the prior approval of the Chief Officer of Human Resources and Chief Legal Officer, in a business or inventions that are in similar fields to his or her work for Luxshare-ICT or that compete with Luxshare-ICT. Without derogating from the above, Luxshare-ICT employees must advise their supervisor and the Human Resources Department before accepting any other employment or initiating any outside business activity. You must avoid using Luxshare-ICT time, facilities, equipment or materials for outside employment or business or use your position to solicit any favored treatment or solicit work for your outside business (See Section IV.A. for discussion of Conflict of Interest).



2. Outside Directorships

Without the prior consent of the Company's Board of Directors, employees may not serve as a member of the board of directors or in any similar capacity of any company that competes with Luxshare-ICT. It may be permissible to serve as a director of a Luxshare-ICT supplier, reseller, customer or other business partner, if an employee first obtains approval from Luxshare-ICT's Chairman of the board before accepting such a directorship or other similar position.

Luxshare-ICT's executive officers must first obtain the consent of the Nominating and Corporate Governance Committee of the Company before accepting a new directorship position. Any compensation received for performance of duties as an outside director must be commensurate with the assumed responsibilities for the company in question.

3. Investments

Employees and executive officers may not own, directly or indirectly, a significant financial interest in any business entity that does or seeks to do business with, or is in competition with, Luxshare-ICT, without obtaining prior approval from the Chief Legal Officer or the Chief Financial Officer. A "significant financial interest" means ownership by you (or a person having a close personal relationship with you), of more than 1% of the outstanding securities or capital value of a corporation or other entity that is publicly traded or more than 5% of the outstanding securities or capital value of a corporation or other entity that is not publicly traded or an investment that is so large either in absolute monetary value or percentage of your total investment portfolio that it could create the appearance of a conflict of interest.

4. Related Parties

Employees should avoid conducting Luxshare-ICT business with someone with whom they have a close personal relationship, or with a business in which such an individual is associated in any significant role ("related person transaction"). (See Section IV.A. for discussion of what is a "close personal relationship.")

You must fully disclose as soon as you become aware of a possible related party transaction the nature of a related person transaction to both the Senior Vice President of your organization and the Chief Legal Officer of Luxshare-ICT.

Related person transactions involving Luxshare-ICT's executive officers and/or members of the Board of Directors must be reviewed and acted upon in accordance with Luxshare-ICT's Related Person Transactions Policy and Procedures. To the extent required under applicable accounting rules, applicable law and regulations, and securities market rules, Luxshare-ICT shall publicly report related person transactions.

5. Consultants and Agents

Consultants and agents must be scrutinized prior to engaging them. Their agreements with Luxshare-ICT must be accurate, in writing, and properly authorized under Luxshare-ICT's Business Authorization Policy. In addition, the following requirements must be satisfied:

- no conflicts of interest must exist with Luxshare-ICT,
- they must be qualified to perform the services for which they were retained, and
- they must have reputable business standards.

If Luxshare-ICT cannot do something because it is illegal or violates this Policy, then an agent or consultant cannot do it either.

FAQ: Who is a consultant or agent?

Answer: Examples of consultants and agents include:

- distributors,
- vendors,
- contractors, and,
- manufacturer reps



FAQ: I am representing Luxshare-ICT in a certain industry association. Do I need special approval before contributing technology to the standard?

Answer: As members of an industry association, Luxshare-ICT's employees, consultants or agents must seek constant direction from Luxshare-ICT Legal Department and must not disclose or contribute Luxshare-ICT confidential information without first being properly authorized by management and the Legal Department to share such information.

6. Industry Associations / Technical Standards

Although memberships, including director positions, in industry associations generally do not present financial conflicts of interest, such positions may pose significant non-financial conflicts for Luxshare-ICT or create the appearance of such a conflict. As a result, they could create risk for Luxshare-ICT's intellectual property interests. Accordingly, no membership, including a director position, shall be entered into, or even applied for, and no standards related activities shall be initiated (such as joining a standards organization or working group, suggesting the creation of a new working group within an industry association) by Luxshare-ICT employees without the express prior written approval of the employee's Senior Vice President and the Chief Legal Officer. Furthermore, any such approved associations must have charter statements and operate under rules that are consistent with antitrust laws.

7. Employment and Supervision of Persons Having Close Relationship with Luxshare-ICT Employees

Luxshare-ICT prohibits, without approval of the Senior Vice President of Human Resources, the employment or engagement of any person having a close personal relationship with another Luxshare-ICT employee in positions or assignments within the same department or in positions that have a financial dependence or influence. If a question arises about whether an employment position comes within the scope of this provision, the Human Resources Department is responsible for determining whether an applicant or transferee will be eligible for the employment position. If a relationship within the scope of this provision exists or develops between two employees or between an employee and a Luxshare-ICT's temporary or contract worker, the employee or the employee in the senior position (as applicable) must bring this to the attention of his or her supervisor. Luxshare-ICT may separate individuals covered by this provision at the earliest possible time, either by reassignment or by termination of employment.

8. Corporate Opportunity

Employees, officers and directors must advance the legitimate interests of Luxshare-ICT when the opportunity to do so arises.

Employees, officers, consultants, contractors and directors may not exploit for personal gain corporate opportunities that arise from use of Luxshare-ICT property, information or position unless, when it applies to: (a) a named executive officer, the opportunity is disclosed fully to Luxshare-ICT's Board of Directors and the Board of Directors declines to pursue such opportunity and confirms that it has no objection to the executive officer's exploitation of such opportunity; and (b) any other person, the Chief Legal Officer and/or the Chief Financial Officer confirm that Luxshare-ICT has no objection to that person's exploitation of such opportunity. The Chief Legal Officer and the President and Chief Executive Officer are charged with the responsibility to report questions under this Section to the Board of Directors.

9. Other Situations

Because other conflicts may arise, it would be impractical to attempt to list all possible situations. Consequently, if a proposed transaction or situation raises any questions or doubts in your mind, you should consult with your supervisor or the Human Resources Department and with the Legal Department.

B. Insider Trading

You may have the opportunity to learn or gain access to information about Luxshare-ICT or companies with which we do business that is unavailable to the public. Such information may be “insider information” within the meaning of relevant securities laws. Consultants and other persons the Company hires to perform services for Luxshare-ICT may also learn or gain access to “insider information”. Luxshare-ICT workers may not disclose to persons outside of Luxshare-ICT any such “insider information”. Relevant securities laws apply to those persons as well if inside information is used to make investment decisions. Trading based on “insider information” is a crime. If you have any questions on whether you have possession of insider information, please contact the Legal Department. *Refer to the Luxshare-ICT Information Management Policy for further information, requirements and instructions.*

C. Accuracy of Books and Records

To accurately reflect all of the Company’s transactions, it is Company policy to maintain all books, records, and accounts in reasonable detail and in accordance with generally accepted accounting principles . The Company is required to maintain at all times a system of internal controls in order to comply with relevant laws and regulations. Further, we have a legal, moral and ethical responsibility to provide full, fair, accurate, timely and understandable disclosure regarding our business and financial condition in the periodic reports we are required to file with the Stock Exchange. *Our obligations under this Section are of paramount importance. Luxshare-ICT expects all of its personnel to take this responsibility very seriously and to provide prompt and accurate answers to inquiries related to Luxshare-ICT’s public disclosure requirements.* Always maintain books, records, and accounts in reasonable detail to accurately and fairly reflect all of the Company’s transactions, and retain relevant documentation in accordance with Company record retention policies. Never, under any circumstance, engage in inaccurate, false or misleading record keeping, even if you believe the consequences of the inaccuracy would be harmless.

No false or artificial entries shall be made in the books and records of Luxshare-ICT. No individual shall ever engage in any arrangement that results in such a prohibited act.

Unreported or unapproved side letters are prohibited. All agreements or deals involving Luxshare-ICT business or resources must be formally documented, executed by an authorized Luxshare-ICT representative in accordance with the Business Authorization Policy, and entered into within Luxshare-ICT’s policies and processes for entering into contracts.

D. Financial Executives

Certain employees have special duties to assure that our public filings provide full, fair, accurate, timely and understandable information. The Chief Executive Officer and the Chief Financial Officer bear a special responsibility for promoting integrity throughout the organization. As a result, these individuals are bound by the following Code of Ethics for Financial Executives. Each agrees that he or she will adhere to and advocate the following principles and responsibilities governing their professional and ethical conduct:

1. To act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships;
2. To provide information that is accurate, complete, objective, relevant, timely



and understandable to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that Luxshare-ICT files with, or submits to, government agencies and in other public communications;

3. To comply with all rules and regulations of national and local governments, and other appropriate private and public regulatory agencies;
4. To act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated;
5. To respect the confidentiality of information acquired in the course of their work, except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of their work must not be used for personal gain;
6. To share knowledge and maintain skills important and relevant to stockholders' needs;
7. To proactively promote ethical behavior as a responsible partner among peers in their work environment and their community; and
8. To achieve responsible use of and control over all assets and resources employed or entrusted to them.

E. Protection of Company Assets

Employees, temporary and contract workers are authorized to use Company assets, facilities, and services only for lawful, proper and authorized purposes. Note that the contents of your Company computer are subject to review and search by the Company. Your obligations with respect to Luxshare-ICT equipment, systems, facilities, corporate credit cards, and supplies are to:

- use only for conducting Luxshare-ICT business (see below concerning Luxshare-ICT equipment),
- be alert to any situations or incidents that could lead to the loss, misuse, or theft of Luxshare-ICT property,
- properly care for equipment that Luxshare-ICT has provided you to prevent waste, misuse or damage,
- keep to a minimum incidental use of Luxshare-ICT equipment for personal reasons and not let incidental use interfere with Luxshare-ICT's business,
- take precautions to protect Luxshare-ICT property entrusted to you from theft or damage, and
- ensure Luxshare-ICT equipment remains fully accessible to Luxshare-ICT and remains the property of Luxshare-ICT.

F. Confidentiality

Luxshare-ICT's assets include confidential information relating to the present or planned business of the Company that has not been released publicly by authorized Company representatives. The following are types of confidential information:

- trade secrets and know-how,
- inventions,
- research and development programs,
- products,
- pricing,
- personnel information,
- financial data,

FAQ: What should I do if I become aware of any loss, misuse or theft of Luxshare-ICT assets, or even the possibility of such an event occurring?

Answer: You must immediately report such situations to any of the following: the Security Department, the Human Resources Department, the Legal Department, the Audit Office, or to your supervisor.



- customer, consultant, contractor, partner, reseller and supplier information, and sales and marketing programs.

All Luxshare-ICT employees must not disclose confidential information to persons or companies outside of Luxshare-ICT unless such persons entered into a non-disclosure agreement with Luxshare-ICT, legitimately need the information in order to work with Luxshare-ICT and you have been properly authorized by management to provide such information. Even within Luxshare-ICT, any employee, contractor and consultant should share confidential information only on a “need to know” basis and subject to terms of the applicable non-disclosure agreement. Obligations of confidentiality to Luxshare-ICT continue after termination of employment with Luxshare-ICT. Luxshare-ICT has a standard non-disclosure agreement suitable for most types of business disclosures. Contact the Legal Department for assistance in obtaining the correct agreement.

Innovations and ideas concerning products or manufacturing processes may be eligible for patent, copyright, trademark or other legal protection. Luxshare-ICT has procedures and programs in place to protect these rights. You should become familiar with these programs and seek legal advice if you have questions.

Employees should never use or accept information offered by a third party that is represented as confidential, or which appears from the context or circumstances to be confidential, unless an appropriate non-disclosure agreement

has been signed. Even after a non-disclosure agreement is in place, the only confidential information received should be information necessary to accomplish the business purpose. If more detailed or extensive confidential information is offered than is necessary for the immediate business purposes, it should be refused or promptly returned. Employees must not sign a third party’s form of non-disclosure agreement without review and approval by the Luxshare-ICT Legal Department.

Once a third party’s confidential information has been disclosed to Luxshare-ICT, there is an obligation to abide by the terms of the relevant Non-disclosure agreement. Pay special attention to the following terms: the scope of the license, the purpose for which the confidential information may be used, its term and who within Luxshare-ICT may receive it. When in doubt, consult with the Legal Department.

G. Respect in the Workplace

Luxshare-ICT strives to maintain a workplace where all individuals, co-workers, customers, partners and vendors are treated with honesty, fairness and respect. Luxshare-ICT does not tolerate discrimination or harassment based upon race, color, religion, gender, age, national origin, ancestry, citizenship, physical or mental disability, medical condition, sexual orientation, gender identity, veteran, or marital status, or any other characteristic protected by law. Moreover, Luxshare-ICT values diversity in its workforce and provides equal employment opportunity for all applicants and employees. We follow these core principles in all areas of employment including but not limited to recruitment, hiring, training, assignment, promotion, compensation, benefits, and other areas as required by law.

Respect in the workplace also encompasses workplace security. Threatening physical harm, engaging in violent behavior, or possessing weapons while on company premises is absolutely prohibited. Similarly, being under the influence of alcohol or illegal drugs while at work is strictly forbidden. If you become aware of any harassment, discrimination, or threats or acts of violence, you should notify a manager or Human Resources immediately.

FAQ: What is a non-disclosure agreement?

Answer: A legal agreement between two or more parties that identifies the confidential information being shared between the parties and how each recipient may use such confidential information.



Additional information can be found in Luxshare-ICT's Equal Employment Opportunity Policy, Harassment-Free Workplace, and other policies relating to appropriate workplace conduct.

V. Administration of Code of Ethics

A. Waivers of Provisions of this Code

Any waiver of any provision of this Code of Ethics for a member of Luxshare-ICT's Board of Directors or an Executive Officer of Luxshare-ICT must be approved and documented by the Luxshare-ICT Board of Directors and promptly disclosed to the Company's stockholders, if and as required by law or the rules of the stock exchange on which Luxshare-ICT's stock is traded. Unless otherwise indicated in this Code of Ethics, Luxshare-ICT's Chief Legal Officer or Chief Financial Officer must approve in writing any waiver of any provision of this Code of Ethics with respect to any other employee, agent, contractor or consultant.

B. Your Duty to Come Forward

As part of its commitment to ethical and legal behavior, Luxshare-ICT requires its employees, officers, directors, temporary or contract workers to report to Luxshare-ICT any actual, suspicious or apparent violations of law or ethical standards so that the violation can be investigated and dealt with appropriately. This obligation extends to any instance where one suspects, but is uncertain whether, a violation may be occurring. Failure to comply with the duty to come forward is a violation of this Code of Ethics and can result in serious disciplinary action, including possible termination of employment.

The Company imposes this requirement even on those who are not directly violating the Company's ethical and legal standards because any time an employee or contractor fails to live up to our ethical and legal obligations, our Company and employees can be profoundly and adversely affected. Penalties and repercussions from unlawful behavior can be devastating, both for our Company and the individuals involved. No one can condone such activities and, therefore, anyone who suspects or is aware of a violation owes a duty to the Company and himself or herself to disclose it.

In addition, management is committed to addressing such concerns and strives to foster openness with employees, consultants and contractors about ethical and legal issues. To meet this objective, the Company encourages you to report wrongdoing and to ask questions if they have any concerns about compliance with law or this Code of Ethics. Toward this end, the Company provides each of you with the following directions.

C. Knowing What Issues to Raise and When

Bring to management's attention any instance involving or suspected to involve unlawful conduct, conduct that violates this Code of Ethics, or pending or proposed conduct which you reasonably believe will violate this Code of Ethics. Raise with management any concern you may have whether proper procedures are being followed, even though you are not certain whether legal or ethical standards are being violated. Let management know whenever you believe adequate resources or training are not being provided so as to enable employees to comply with legal standards applicable to the Company.

Raise questions promptly so that the issues can be dealt with early. Normally you should take issues to your immediate supervisor, but you may also satisfy your



obligation to bring issues forward by contacting the:

- The Board of Directors; or
- Chairman of the Board; or
- Vice President of each Business Unit; or
- Chief Financial Officer; or
- Chief Officer of Human Resources; or
- Senior Director of Internal Audit.

D. Assurance of Non-Retaliation

Luxshare-ICT recognizes your concerns regarding coming forward with a complaint and it will thus not tolerate any discrimination or retaliation against any person who, in good faith, reports any matter under this Code of Ethics, although coming forward will not necessarily immunize a person from the consequences of his or her own misconduct, if such misconduct exists. Employees who attempt retaliation will be subject to disciplinary actions, up to and including termination of employment.

As used in this Code of Ethics, retaliation refers to reprisal, interference, restraint, penalty, discrimination, intimidation or harassment, determined in accordance with applicable legal standard.

E. Investigation of Complaints and Disciplinary Action

The matters covered in this Code of Ethics are of the utmost importance to Luxshare-ICT and we expect all of our employees, agents, temporary or contract workers to adhere to these rules in carrying out their duties for the Company.

All reports of alleged violations under this Code of Ethics will be promptly and thoroughly investigated. All information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, or as required by applicable law. If it is determined that a Code of Ethics violation has occurred, we will take prompt remedial action proportionate to the severity of the offense.

This remedial action may include disciplinary action up to and including termination of employment. Reasonable steps will also be taken to prevent any further violations of the Policy at issue. Where laws have been violated, Luxshare-ICT will cooperate fully with the appropriate authorities. Where the Company has suffered a loss, it may pursue its remedies against the individuals or entities responsible.

LIÊN KẾT SÁNG TẠO THÀNH T

Câu hỏi: Tại sao tôi phải xác định mình hiểu và tuân thủ các quy định?

Luxshare-ICT

Trên đây là Công ty yêu cầu toàn thể công nhân viên, nhân viên quản lý và thành viên Hãng Quản trị phải tuân thủ

LIÊN KẾT SÁNG TẠO THÀNH T

chúng tôi.

Câu hỏi tiếp theo: Chiều
kinh doanh của thị trường
gồm những nội dung gì?

Trả lời: Quá trình
hoạt động của thị trường,
đặc biệt cá nhân, sự đóng
vào thị trường, phát triển, tham
gia phát hành chứng khoán, hoặc
cá nhân khác

Luxshare-ICT

Câu hỏi tiếp theo: Nếu một
nhà đầu tư của Luxshare -
ICT các khách hàng mới
tham gia hoạt động thì thao
chức quản lý thành công của
phải làm gì?

LIÊN KẾT SÁNG TẠO THÀNH T

Tr 1 i: Chung k u th
thao, Super Cup và các ho t
ng th (nh t
là bao g m khách s n) là quà
t , có th coi là quà
t ng không phù h p, ph i
nh c phê duy t c a ch
qu n B ph n Pháp v ,
Phòng Ki m toán.

Luxshare-ICT 5,000

Câu h ng g p: N u có
i m i Luxshare ICT
quyên góp 5000 RMB
(kho ng 15.000.000 VND)
làm ph n ng cho

ng c t ch c vào
ngày ngh ho c ho ng t p
th khác c a khách hàng thì
ph i làm gì?

500

Tr 1 i: Tuy i không
c cung c p ph n ng
b ng tí n m t. Phi u quà t ng
s phù h u
t quá 500 RMB (kho ng
1.500.000 VND), thì ph i
c ch qu n B ph n Pháp
v và Phòng Ki m toán phê
chu n.

Câu h ng g p: N u tôi
không th

LIÊN KẾT SÁNG TẠO THÀNH T

Tr 1 i: N u th c m c, có th liên l c v i ch qu n B ph n Pháp v , Phòng Ki m toán.

Luxshare-ICT

Câu h ng g p: N u công nhân viên c a Luxshare-ICT tr ti n quà t thanh toán thì làm th nào?

Luxshare-ICT

Tr 1 i: N u quà t ng liên n nghi p v c a Luxshare-ICT, thì công nhân tí không xin thanh toán v n áp d nh này.

Câu h ng g p: Nh ng ng i nào là quan ch c chính ph ?

Tr 1 m trừ r t r ng l n, bao g m nhân viên làm vi c t i chính quy a p nhà c và m t s t ch c qu c t

Câu h ng g i th c nh tranh?

Luxshare-ICT

Luxshare-ICT

Luxshare-ICT

- 500

Quà t ng t quá 500 RMB (kho ng 1.500.000 VND), tr ng h c ch qu n B ph n Pháp v và Phòng Ki m toán phê chu n

- C nh m n quy t sách ho c có th l i n quy t sách ho i khác.

- Ch qu n B ph n Pháp v , Phòng Ki m toán n, t ý t ch c cho quan ch c chính ph c a b t k qu c gia nào, ho c tham gia chính ph .

- C l i i báo c k v ng nh

- ho

- Cung c p tí n m t, c phi u, quy n b phi u ho c cho vay

- Luxshare-ICT Công khai thông tin s ng tiêu c n Luxshare-ICT

- Quà t ng vi ph m pháp lu t ho c chính sách nh n quà c a công ty

(iii) /Chính sách quyên góp

N u c c ch qu n cao nh t B ph n Pháp v ho c Tài v phê chu n i di n Luxshare-ICT quy nh quyên góp

- (iv) /Nh ng h p ph c phê chu n

500

Quà t ng có giá tr trên 500 RMB (kho ng 1.500.000 VND) ho c b t c nào không phù h p nh u ph i c ch qu n B ph n Pháp v , Phòng Ki m toán phê chu n theo tình hình c th . N u vì phép l ch s , ph i nh n ph n quà không phù h p v i nh u trên, ph i l p t c báo cáo b ng n cho ch qu n B ph n Pháp v , Phòng Ki m toán và làm theo ch th .

- (v) /Ch n quan ch c chính ph

N u liên quan n quan ch c chính ph , s t l n, chúng tôi ph m b o tuân th pháp lu t và lu t ch ng h i l khác c a khu v c và qu c khi t ng quà ho quan ch c chính ph , ph i tham kh o ý ki n c a B ph n Pháp v .

Chú ý: M t s b ph n (ví d B ph n Thu mua) s nh nghiêm ng vi c t ng và nh n quà. Công nhân viên làm vi c t i các b ph n này ph i tuân th nh liên quan.

LIÊN KẾT SÁNG TẠO THÀNH T

Tr lời: i th c nh tranh truy n th ng c a Luxshare-ICT i th c nh tranh có th là khách hàng, i tác h i lý, nhà cung ng c a Luxshare-ICT hi n t i ho i cung c p d ch v cung c p ho c k ho ch cung c p s n ph m ho c d ch v có th c nh tranh v i Luxshare-ICT.

C. /Tuân th c nh tranh

Luxshare-ICT

Luxshare-ICT

Luxshare - ICT c g ng th hi n s c c nh tranh to l n trên th ng. Luxshare - ICT s luôn kiên trì kinh doanh nghi p v theo t t c u kho n và tính th n pháp lu t liên quan n ki ng t do và canh tr nh công b ng. Chúng tôi s nghiêm túc tuân th Lu t Ch c quy n và Lu t C nh tranh t i khu v c và qu c gia liên quan (n u phù h p). Chúng tôi s luôn phát tri n nghi p v theo nguyên t c công b ng, thành th c và có c. Vi ph m Lu t Ch c quy n là hành vi vi ph m nghiêm tr ng, s khi n công ty và cá nhân c x lý hình s , x lý dân s và t t ng dân s nghiêm tr ng.

Luxshare-ICT

M t s i th c nh tranh ng b coi là hành vi vi ph m pháp lu t t i m t s qu c gia trên th gi i.

Câu h ng g p: N u có i lý khi u n i i th c nh tranh cung c p s n ph m c a Luxshare-ICT v i giá r t th p thì làm th nào?

N u không c B ph n Pháp v phê chu n, tuy i không c th o lu n, ký k t th a thu n b ng v b n ho c b ng mi ng, ho i nh i i th c nh tranh; ho c ph i h p th o lu n v i th c nh tranh nh ng v

Luxshare-ICT

• Luxshare-ICT /

Giá thành s n ph m c a Luxshare - ICT và/ho c i th c nh tranh (bao g m chỉ phí trung gian), m giá c ho i giá c

• /

Phân chia th ng ho c khách hàng v i i th c nh tranh

• Luxshare-ICT /

H n ch ho c c t gi m s ng ho ng cung ng s n ph m c a Luxshare - ICT và/ho i th c nh tranh

•

i trình t m i th u, báo giá không chính xác, ho c thông báo quy nh có báo giá hay không

•

Không i nghi p v v i bên th ba, ho c ch m d t ch m d t nghi p v v i bên th ba (t i ng)

• Luxshare-ICT

Câu h ng g p: N i th c nh tranh c g ng th o lu n nh ng v này v i chúng tôi, thì ph i làm gì? N u tôi không th nh có th th o lu n v nào i làm gì?

Chính sách ho nh giá, t l l i nhu n, h ng ho u kho n tín d ng, giá thành, t n kho, l trình s n ph m, k ho ch tiêu th ho c k ho ch s n xu t c a Luxshare-ICT ho c b t k i th c nh tranh bên th ba khác

Nh nh này áp d ng cho i nghi p v h ng ngày và cá ng h p khác, bao g m hi p h i ngành ngh ho c h i ngh t ch c ngành ngh khác. Trong m t s ng h p, doanh nghi p liên doanh h p pháp và s p x c bi c v i th c nh tranh có th c cho phép v ng h p ngo i

Tr lời: B n ph i ch m d t bu i nói chuy n và xin ý ki n ch o c a B ph n Pháp v .

l , tuy nhiên v n c n B ph n Pháp v th m tra và phê chu n.

Luxshare-ICT

Trong quá trình i v i

LIÊN KẾT SÁNG TẠO THÀNH T

m c n lu t pháp t i qu c gia ho c khu v c bi t, có th liên h B ph n Pháp v c a Luxshare-ICT.

-ICT

Luxshare - ICT thu th p thông tin c nh tranh m t cách n tin h p pháp, không tham gia ho ng nghi p v không . Ho ng nghi p v không bao g m:

•

V ng g p: N u không t ng quà quan ch c chính ph c ngoài, ch t ng quà i thân c a quan ch c chính ph c ngoài c không?

Ph i th c nh tranh ho c s n ph m ho c d ch v c a h , miêu t sai i th c nh tranh ho c s n ph m ho c d ch v c a h , tr m c p ho c s d ng bí m t nghi p v c i th c nh tranh, d d trái phép khách hàng vi ph m h ng v i th c nh tranh (không ph i c nh tranh nghi p v lành m nh).

•

Luxshare-ICT Luxshare-ICT
Yêu c u nhà cung ng mua s n ph m c a Luxshare-ICT, m i có th bán s n ph m ho c cung c p d ch v cho Luxshare-ICT

•

Tham gia ho ng nh giá ho c ho ng khác có th l i nhà cung ng ho i khác

Tr l i: T ng quà có giá tr i thân c a quan ch c chính ph c ngoài có th coi là t ng quà cho quan ch c chính ph c ng này thu c ph m vi nghiê m c m.

Luxshare-ICT

Chúng tôi không cho phép bên th ba có i nghi p v v i chúng tôi tham gia các ho ng mà chính sách này nghiê m c m. N u th c m c, có th liên h v i B ph n Pháp v c a Luxshare-ICT.

D. /Ch ng h i l

Câu h ng g p: Tôi ph i i nghi p v v i chính ph nào?

Tr l i nghi p v v i chính ph c ngoài ph c B ph n Pháp v ng ý b n.

LIÊN KẾT SÁNG TẠO THÀNH T

Câu hỏi tiếp theo: Nếu tôi cho r... t... h... n... h... c... s... p... x... u... t... h... i... n... h... à... n... h... v... i... v... i... p... h... n... g... i... a... o... đ... ch... ,... t... o... i... p... h... i... l... à... m... t... h... à... o... ?

a quan ch c chính ph c ngoài r r ng, có th gi i thích là bao g m quan ch c c p cao và nhân viên c p th p t chính ph ch c qu c t , bao g m quân nhân, nhân viên h i quan và thu , nhân viên t i i h c, b nh vi n, doanh nghi u hóa m t ph n c s h u m t ph n nh c ph n) ho c nhân viên c a doanh nghi p ho c c. B n có th tìm danh sách doanh nghi c c a m t qu tìm ki m danh sách doanh nghi c Trung Qu c)

Luxshare-ICT
Tr l i: B n ph i liên l c v i B ph n Pháp v c a Luxshare-ICT c khi t i n hành giao đ ch xu t kh u ho c nh p kh u.

Luxshare-ICT
Luxshare-ICT
Luxshare-ICT
Luxshare-ICT
Gián ti p nh ng vi c c m công nhân viên c a Luxshare-ICT m c v i đi n tiêu th i đi n, nhà th u i lý ho c b t k bên th i nghi p v v i Luxshare-ICT ho i đi n Luxshare-ICT tr i n khai nghi p v làm. Không cho phép b t c i đi n Luxshare-ICT tr i n m t cách phi pháp cho quan ch c chính ph c ngoài.

Câu hỏi tiếp theo: Tài li u cá nhân là gì?

N u b n bi t ho c có lý bi t c v n tr i n cho quan ch c chính ph c ngoài, Luxshare-ICT và b n có th u ph i ch u trách nhi m. X lý vi ph m bao g m ph t t i n m c cao, th m chí còn bao g m t m giam. N u có ám th ho c c nh báo ho ng phi pháp (g u nguy hi , b n u tra, b n có th b coi là bi t chuy n. B n ph i tuân th trình t l a ch n khách hàng, nhà s n xu t và i tác h p tác nghiêp v khác c a Luxshare - ICT và ph i duy trì c i v i nh ng v này.

Tr l i: B t c thông tin gì có th nh n đi n, theo đ i, liên l c ho c tìm ki m cá nhân ho c máy tính cá nhân.

i nghi p v t r ng, không ch bao g , mà còn bao g m t ng qu giá tr cho quan ch c chính ph i nghi p v , ví d : tr t i n cho nhân viên thu ho c h i quan, th m chí còn bao g m i nghi p v mà cu i cùng không ph i là v i quan ch c chính ph c ngoài.

Câu hỏi tiếp theo: Nếu anh/em c a tôi v a b u làm vi c cho m t khách hàng c a chúng tôi, tôi là nhân viên bán hàng ph trách khách hàng này, thì tôi ph i làm gì?

Luxshare-ICT
Tr t i n n ti ý r ng, chính sách c a Luxshare - ICT không cho phép tr t i n mang tính thu n ti mang tính ng , b i t i qu c gia mà b n tr t i n, hình th c tr t i n này u là hành vi vi ph m pháp lu t.

E. /Tuân th
m i(nh p kh u, xu t kh ng)

Luxshare-ICT
Luxshare-ICT
T ng, nh p kh u hàng hóa và đ ch v c a m t qu c bi t ph i tuân th nh pháp lu t t i qu Công nhân viên, công nhân th i v và công đ i c n a P X i A V D h o Q T i a Luxshare-ICT ph m b o s n ph m và hàng hóa mà Luxshare-

Tr l i: B n ph i báo cáo vi c này v i công ty theo ng thông báo và phê chu n ho t l i

LIÊN KẾT SÁNG TẠO THÀNH T

Luxshare-ICT (Mã số thuế: 0310490T86b5Pö, 3gđl sđ 60% đđ, dHn10,4,APĐ, Á mã Ú, EN2,4ê, P4Đ, ìb60C, Tđđ, Ba6PA7pu
Luxshare - ICT cam kết tôn trọng và bảo vệ quyền lợi của bất kỳ cá nhân nào cung cấp thông tin cá nhân cho Luxshare - ICT (bao gồm công nhân viên và khách hàng của Luxshare - ICT). Nếu bạn thu thập, sử dụng

Câu hỏi tiếp theo: Tôi là nhân viên thu mua của công ty, tôi có thể cho mời nhà cung cấp của chúng tôi hoàn thành nhiệm vụ không quan trọng nhất của bạn mời tôi hay không?

Trên đây là nội dung báo cáo vi phạm thông báo và phê chuẩn hoạt động của Bộ phận Pháp vụ của công ty phê chuẩn.

LIÊN KẾT SÁNG TẠO THÀNH T

1. /Làm thêm bên ngoài và phát minh ch t o

Luxshare-ICT

Luxshare-ICT

Luxshare-ICT

Luxshare-ICT

Luxshare-ICT

IV.A

Trong th i gian làm vi c t i Luxshare - ICT, c c làm vi c cho nhà cung ng, nhà
tiêu th , khách hàng ho i th c i v i bên th ba khác, b n c làm cho bên th ba b t
k vi c gì có kh ng không t n hi u su t công vi c ho a mình. Ngoài
ra, n u ch qu n cao nh t B ph n Tài nguyên nhân l c và B ph n Pháp v không ng ý, công nhân viên
c làm nghi p v ho c phát minh ch t o gi ng v i công vi i Luxshare - ICT ho c c nh
tranh v i Luxshare - ICT. N u không vi ph m nh nh c khi nh n công vi c khác ho c b u
nghi p v bên ngoài, công nhân viên t i Luxshare - ICT ph i thông báo cho ch qu n tr c ti p và B ph n Tài
nguyên nhân l c. B c dùng th i gian, , thi t b và v t li u c a Luxshare - ICT làm công vi c
ho c nghi p v bên ngoài, ho c l i đ ng ch c v tìm ki m c tìm vi c cho nghi p v bên
ngoài c a b n (Có th c th o lu n v t l i ích t i ph n IV.A).

Câu h ng g p: Ai là c
v n ho i lý?

2. / m nhi m ch c v H ng Qu n tr bên ngoài

Luxshare-ICT

Luxshare-ICT

Luxshare-ICT

Tr l i: C v i
lý g m:
i lý
Nhà s n xu t
Nhà th u
i di n nhà s n xu t

N u H ng Qu n tr c m nhi m ch c v thành viên H i
ng Qu n tr ho t i công ty c nh tranh v i Luxshare-ICT. N m nh n ch c v H i
ng Qu n tr ho F&A;VD& c Ch t ch H ng Qu n tr Luxshare-ICT phê chu n, có th
m nh n ch c v thành viên H ng Qu n tr c a nhà cung ng, nhà tiêu th , khách
hàng ho i tác h p tác nghi p v khác c a Luxshare-ICT.

Luxshare-ICT

T c khi nh n ch c v H ng Qu n tr m i, nhân viên qu n lý c p cao c a Luxshare-ICT ph i c
c H ng Qu n tr

Luxshare-ICT

Câu h ng g i
đi n cho Luxshare-ICT t i
m t hi p h i ngành ngh .
c khi cung c p k thu t
cho các tiêu chu n, có c n
nh n c phê chu c bi t
không?

Luxshare-ICT

Luxshare-ICT

Luxshare-ICT

Tr l i: V i

LIÊN KẾT SÁNG TẠO THÀNH T

viên c a h i p h i ngành v i mình ho c v i doanh nghi p mà i có quan h cá nhân m t thi t v i mình có liên quan to l n t
ngh , công nhân viên, c v n . (Có th c th o lu cá nhân m t thi i ph n IV.A)
ho i lý c a
Luxshare-ICT ph ng
xuyên xin ý ki n ch o c a Luxshare-ICT
B ph n Pháp v , n
c s y quy n thích h p
c a nhân viên qu n lý và B G
ph n Pháp v c
t i l ho c chia s thông tin
t c a Luxshare-ICT.

Luxshare-ICT
Khi phát hi n giao d ch các bên liên quan, ph i l p t c báo cáo tính ch t c a giao d ch này v i Phó T ng
c (g m) tr lên và ch qu n B ph n Pháp v t i mà b .
Luxshare-ICT / Luxshare-ICT
Luxshare-ICT

Giao d ch các bên liên quan n nhân viên qu n lý c p cao và/ho c thành viên H ng Qu n
tr ph i ki m tra và áp d ng bi n pháp theo chính sách và trình t giao d ch các bên liên quan c a Luxshare-ICT.
Luxshare - ICT s tuân th nh k u l nh pháp lu t l nh th ng ch ng
khoán phù h p, công b giao d ch các bên liên quan trong ph m vi yêu c u.

5. /C v i di n

Luxshare-ICT

Luxshare-ICT
c khi tuy n d ng c v i di n ph i u tra k ng. Th a thu n mà nh ng cá nhân này
ký k t v i Luxshare-ICT ph i rõ ràng và ký k t b c phê chu n theo chính sách y
quy n nghi p v c a Luxshare - ICT. Ngoài ra, còn ph ng nh ng yêu c u sau:

- Luxshare-ICT
Không có t l i ích v i công ty,
- Nh i này ph i có p d ch v cho thuê,
- Ph i có tiêu chu n nghi p v có danh ti ng t t.

Luxshare-ICT

N u Luxshare - ICT không th th c hi n ho ng này vì có ho ng phi pháp ho c vi ph m chính sách
này thì i di n ho c c v th c hi n ho ng này.

6. / /Hi p h i ngành ngh / tiêu chu n k thu t

Luxshare-ICT

Luxshare-ICT
Luxshare-ICT

Luxshare-ICT

Câu h ng g p: N u tôi
bi t

Tuy h i viên hi p h i ngành ngh (bao g m c ch c v ng không t o nên
t v l i ích kinh t , tuy nhiên nh ng ch c v này v n có th t v l i ích phi kinh t quan
tr ng ho c gây t cho Luxshare-ICT ng ch c v này có th gây nguy hi m cho l i
ích b n quy n trí tu c a Luxshare - ICT. c Phó T ng G c b ph n mình và ch qu n
B ph n Pháp v phê chu n b n, công nhân viên c nh n ho c i viên (bao g m
ch c v H ng Qu n tr)

Tr l i: B n ph i l p t c báo
cáo vi c này v i b ph n
ho i sau: B ph n B o
an, B ph n Tài nguyên nhân
l c, B ph n Pháp v , Phòng
Ki m toán n i b ho c ch
qu n tr c tí p.

LIÊN KẾT SÁNG TẠO THÀNH T

Câu hỏi: Th a
thu n b o m t là gì?

Tr l i: Th a thu n pháp lu t
do hai ho c nhi u bên ký k t,
th a thu n này li t kê thông
t mà các bên chia s
v i nhau và các bên tí p nh n
thông tin s d ng thông tin
nào.

LIÊN KẾT SÁNG TẠO THÀNH T

C. /Tính chính xác của số kế toán và ghi chép

Luxshare-ICT

Luxshare-ICT

phần ảnh chính xác toàn bộ giao dịch của công ty, công ty yêu cầu toàn bộ số kế toán, ghi chép và tài khoản m t cách h p lý và chi ti t ng th i phù h p v i chu n t c k c công nh n. Công ty yêu c u luôn ph i duy trì h th ng qu n lý n i b phù h p v i yêu c u c a quy nh pháp lu t liên quan. Ngoài ra, chúng tôi còn có trách nhi m v pháp lu c và luân lý, khi c yêu c u n p báo cáo nh k lên sàn giao d ch ch ng khoán, u thông báo tình hình liên quan n nghi p v và tài chính c a chúng tôi m t cách toàn di n, công b ng, chính xác, k p th i và d hi u. Trách nhi m mà chúng tôi ph c quy nh trong ph n này r t quan tr ng. Luxshare - ICT hy v ng toàn th công nhân viên gánh vác trách nhi m này m t cách nghiêm túc, a tr l i k p th i và chính xác các ki m tra liên quan n yêu c u thông tin công khai c a Luxshare - ICT. Luôn gi s k toán, ghi chép và các tài kho n m t cách h p lý và chi ti t, ph n ảnh toàn b giao d ch c a công ty m t cách chính xác và công b ng, a b o qu ki n liên quan theo ghi chép c a công ty. Không gi ghi chép không chính xác, gi t o ho c gây hi u nh m trong b t k hoàn c nh nào, ng h p b n cho r ng ghi chép không chính xác không có h i v y.

Luxshare-ICT

c nh p n i dung không chính xác ho c ng y t o vào s k toán và ghi chép c a Luxshare-ICT. Không tham gia vào b t k s p x p nào d n nh ng hành vi b nghiêm c m này.

Luxshare-ICT

Luxshare-ICT

Luxshare-ICT

N c phê chu n, nghiêm c m ký k t th a thu n s i b sung. T t c th a thu n ho c giao d ch n nghi p v ho c tài nguyên c a Luxshare-ICT ph i c ghi chép m t cách chính th c, i di c Luxshare-ICT y quy n ký k t theo chính sách y quy n nghi p v , a ký k t theo chính sách và trình t áp d ng cho vi c ký k t ng t i Luxshare-ICT.

D. /Nhân viên qu n lý tài v

M t s công nhân viên gánh vác trách nhi c bi m b o báo cáo công khai c a chúng tôi cung c p thông tin m t cách toàn di n, công b ng, chính xác, k p th i, d hi u hành và G c tài chính có trách nhi y thành tín t i toàn b u , nh ng cá nhân này ph i tuân th n t c quy ph c c a nhân viên qu n lý tài v i i u ng ý tuân th và ng h nguyên t c và ch c trách ki m soát hành vi chuyên môn và

1.

Làm vi c thành th c và thành tín, trong quan h cá nhân và chuyên môn, l i ích th c t ho c gây ng t l i ích.

2.

Luxshare-ICT

Cung c , khách quan, phù h p, k p th i và d hi m b o ki n mà Luxshare-ICT n n truy i chúng thông báo thông tin m t cách toàn di n, công b ng, chính xác, k p th i và d hi u.

LIÊN KẾT SÁNG TẠO THÀNH T

3. Tuân thủ tất cả các nghĩa vụ pháp lý, chính quy và chính phủ có liên quan.

4. Làm việc theo nguyên tắc chân thành, trách nhiệm, công bằng, phù hợp và minh bạch, không báo cáo sai sót.

5. Trong hợp phi thông báo thông tin mà báo cáo trong quá trình làm việc theo quy định hoặc theo yêu cầu pháp luật, ngoài ra phi tuân thủ tính minh bạch của thông tin này cũng có trong thời gian làm việc cá nhân;

6. Chia sẻ thông tin và liên quan theo yêu cầu;

7. Không làm việc cạnh tranh với công ty và các đơn vị khác có trách nhiệm, tích cực chấp hành các hành vi phù hợp với;

8. Sử dụng và quản lý một cách có trách nhiệm tài sản và tài nguyên giao quản lý.

E. /B o v tài s n c a công ty

Luxshare-ICT

Công nhân viên, công nhân thời vụ và công nhân hàng giờ của công ty và dịch vụ của công ty vì mục đích pháp lý, phù hợp với quy định pháp luật, công ty có thể kiểm tra và tìm kiếm nội dung trên máy tính của công ty mà báo cáo. Trách nhiệm của báo cáo viên là thời gian, địa điểm, thời điểm và địa điểm.

- Luxshare-ICT Luxshare-ICT
Chức vụ phát triển nghiên cứu của Luxshare-ICT (Tham khảo danh sách nhân viên của Luxshare - ICT),
- Luxshare-ICT
Luôn cảnh giác với những tình huống có thể gây tổn thất, mất mát tài sản của Luxshare-ICT,
- Luxshare-ICT
Báo quản lý các thiết bị mà công ty cung cấp cho bạn, tránh lãng phí, mất mát hoặc làm hỏng,
- Luxshare-ICT
Luxshare-ICT
Chức vụ của Luxshare-ICT vào mùa hè và mùa đông kèm theo nhu cầu, địa điểm báo cáo của công ty, không báo cáo của công ty,
- Luxshare-ICT
Áp dụng các biện pháp phòng ngừa, báo quản các tài sản mà công ty giao cho bạn, tránh vì các sự cố hoặc mất mát,
- Luxshare-ICT Luxshare-ICT Luxshare-ICT
Báo quản các thiết bị của Luxshare - ICT luôn sẵn sàng, và luôn là tài sản của Luxshare - ICT.

LIÊN KẾT SÁNG TẠO THÀNH T

F. /B o m t

Luxshare-ICT

Tài s n c a Luxshare - ICT bao g m nh m t c i di n do công ty y quy n công khai t l nghi p v hi n t i và quy ho ch c a công ty. Nh ng thông tin m t này bao g m:

- Bí m i và công ngh c quy n,
- Phát minh ch t o,
- K ho ch nghiên c u và phát tri n,
- S n ph m,
- Giá c ,
- Thông tin nhân s ,
- S li u tài chính,
- Thông tin khách hàng, c v n, nhà th u i tác h p tác, nhà phân ph i, nhà cung ng
- K ho ch tiêu th và kinh doanh.

Luxshare-ICT Luxshare-ICT Luxshare-ICT
Luxshare-ICT Luxshare-ICT Luxshare-ICT
Luxshare-ICT Luxshare-ICT Luxshare-ICT

Toàn th công nhân viên Luxshare-ICT c ti l thông tin m t c a công ty cho cá nhân ho c công ty bên ngoài Luxshare-ICT, tr khi nh ký th a thu n b o m t v i Luxshare-ICT, có lý do n nh ng thông tin này m i có th làm vi c cho Luxshare-ICT a sau khi c nhân viên qu n lý y quy n m i có th cung c p nh ng thông tin này. Ngay c trong n i b Luxshare-ICT, công nhân viên, nhà th u, c v n ch nên chia s ng h n thi a ph i tuân th các u kho n th a thu n b o m t. Trách nhi m b o m t v i Luxshare-ICT v n ti p t c t n t i ngay c khi công nhân viên m d t quan h ng v i Luxshare-ICT. Luxshare - ICT có th a thu n b o m t tiêu chu n phù h p v i ng h p thông báo thông tin nghi p v . Có th yêu c u B ph n Pháp v h tr tìm th a thu n phù h p.

Luxshare-ICT

C i t i n ng k thu t n s n ph ch t o có th c b o v b i b ng sáng ch , b n quy u ho c pháp lu t khác Luxshare - ICT xây d ng trình t và k ho ch b o v quy n l i này. B n ph i hi u k ho ch này, n u th c m c có th n lu t pháp.

Luxshare-ICT
Tr ký th a thu n b o m ng, n

LIÊN KẾT SÁNG TẠO THÀNH T

chu

c ký th a thu n b o m t v i bên th ba.

Luxshare-ICT

Luxshare-ICT

Khi Luxshare - ICT nh c thông tin m t do bên th ba cung c p, ph i có trách nhi m tuân th kho n n th a thu n b o m t. C c bi u kho n sau: ph m vi cho phép, m h n s d i nào trong n i b Luxshare-ICT có th nh n nh ng thông tin này. N u m c, có th liên h v i B ph n Pháp v .

G. /Tôn tr ng t c

Luxshare-ICT

Luxshare-ICT

Luxshare-ICT

Luxshare - ICT c g ng duy trì ng làm vi t t c ng nghi i tác tác và nhà cung ng nh t, công b ng và l ch s . Luxshare - ICT không ch p nh n k ho c qu y r i xu t phát t dân t c, màu da, tí ng tôn giáo, gi i tính, tu i tác, qu c t ch quán, thân ph n công dân, tàn t t ho c có v tâm th u ki n y t ng gi i tính, xác nh r tính, b i xu , tình tr ng hôn nhân ho c pháp lu t b o v goài ra Luxsh ICT coi tr , ng th i tuy n d ng công b ng cho t t c viên và công nhân viên. Trong t t c c tuy n d ng, chúng tôi tôn tr ng các nguyên t c c t lỗi, bao không h n ch tuy n d ng, s d o, s p x p công vi ch c nh c khác mà pháp lu t yêu c u.

Tôn tr ng l ch s t c còn bao g m an toàn t c. T c, nghiêm c r i khác, tham gia hành vi b o l c ho c mang theo . Ngoài ra, c m u u ho c s d ng ma túy phi pháp t m vi c. N u b n phát hi n ra b t k hành vi qu y r th ho c b o l c ho a s d ng b o l c nào, c n l p t c báo cáo v i G c ho c B phi T tài ng nhân l c.

Luxshare-ICT

Ngoài ra, thông tin chi ti t có th tìm th i tuy n d ng công b ng, chính sách k qu y r i t c và chính sách liên quan n hành vi phù h p t c a Luxshare-ICT.

V. /Qu Chu n t c quy ph

A. /Mi ứ tr th c hi n các u kho

LIÊN KẾT SÁNG TẠO THÀNH T

- Chức Hạng Qu n tr
- BU
- Phó T c các BU,
- ch qu n cao nh t B ph n Tài v
- ch qu n cao nh t B ph n Tài nguyên nhân l c,
- ch qu n Phòng Ki m toán n i b

D. / Cam kết không tr thù

Luxshare-ICT

Luxshare - ICT hi u lo l ng c a b i v i v báo cáo này, không cho phép k th ho c tr thù i có thi n chí báo cáo v liên quan n n t c quy ph , cho dù v c có th mi n tr h u qu do sai sót c a i báo cáo gây ra (n u có). Cá nhân tr thù s b x lý k lu t, hình th c x lý k lu t cao nh t bao g m sa th i.

Tr thù trong n t c quy ph hành vi báo thù, can thi p, h n ch , tr ng ph t, k th đ a ho c qu y r nh theo tiêu chu n pháp lu t liên quan.

E. /Bi i u tra khi u n i và x lý k lu t

Luxshare-ICT

V n t c quy ph m c này là v quan tr ng nh i v i Luxshare - ICT, chúng tôi hi v ng, trong quá trình th c hi n ch c trách t i công ty, toàn th công i đi n, công nhân th i v và công nhân h ng tuân th nh ng quy t c này.

L p t u tra tri báo cáo hành vi vi ph n t c quy ph u tra, c tí t l u c b o m t, tr ng h p ph i tí t l theo yêu c u u tra và áp đ ng bi n pháp kh c ph c ho nh c a pháp lu t liên quan. N u xác nh n th c s x y ra hành vi vi ph n t c quy ph chúng tôi s l p t c áp đ ng bi n pháp kh c ph c vào tính nghiêm tr ng c a hành vi vi ph m.

Luxshare-ICT

Bi n pháp kh c ph c có th bao g m x lý k lu t, cao nh t là sa th i. Ngoài ra, còn áp đ ng bi n pháp h p lý, tránh hành vi vi ph m các chính sách liên quan. N u xu t hi n hành vi vi ph m, Luxshare - ICT s h p tác toàn đi n v i c u quan. N u công ty có b t k t n th t nào, công ty có th yêu c u i ho có trách nhi m b ng.

LIÊN K T SÁNG T O THÀNH T
