



NOA Compliance Code

Company Introduction

NOA was established in 1999 and is an independent, impartial and professional comprehensive inspection, testing, certification and R&D organization. NOA is a designated laboratory for China's national compulsory product certification and one of the earliest third-party service organizations in the country to engage in inspection, testing and certification.

NOA is headquartered in Shanghai, China, with several domestic testing, inspection (supervision), certification, and R&D institutions, a 35,000 square meter testing laboratory, and a technical service team of more than 2,000 people.

NOA is a global testing, inspection and certification (TIC) service provider for advanced materials science, environmental protection, biopharmaceutical R&D and CMC pharmaceutical research, general consumer product quality services, cosmetics research services, industrial product services, and engineering quality assurance services. NOA provides a combination of more than 250,000 analytical methods to provide customers with comprehensive testing and evaluation services for the safety, compliance, applicability and sustainability of products or organizations. NOA uses accurate and timely results, high-quality innovative services and professional technical experience to create unique analytical solutions and widely applicable quality assurance methods for customers.

NOA shoulders the responsibility of helping Chinese manufacturing enter the international market and is committed to becoming an international benchmark in the field of quality assurance. We firmly believe that we can promote the development of the industry by constantly challenging ourselves. NOA and its subsidiaries are committed to supporting society and enterprises while actively fulfilling their social and corporate responsibilities, adhering to the tenet of "Respect, Growth, Sustainability and Inclusiveness".

Scope

All personnel of NOA Testing & Certification Group Ltd., its subsidiaries with a shareholding ratio of 50% or more, or entities where the company has a controlling interest, as well as other related independent legal entities, including directors, executives, managers, supervisors, and employees, must comply with this Compliance Code and the policies, standards, processes, and procedures referenced therein. Employees should strictly abide by this Code and will not be demoted, punished or otherwise adversely affected even if it results in business losses.

1. Integrity

NOA takes honesty and trustworthiness as one of its corporate principles, requiring all employees and all partners to maintain professionalism, independence and impartiality in the work process, and strictly abide by laws, regulations, industry norms and corporate rules and regulations. NOA strictly guarantees the authenticity of all data, test results and other key information, prohibits any improper changes, and ensures accurate presentation of actual findings, professional opinions and results. NOA always abides by all laws and regulations within its business scope, eliminates violations, and adopts a zero-tolerance policy for falsification, manipulation of assessments, test processes, quality assurance investigations and reports. Violators will face severe disciplinary sanctions including dismissal. When it comes to environmental protection, health, safety and other fields, NOA pays special attention to the update and dynamic changes of regulations to ensure that services always meet the latest requirements.

Employees must comply with integrity requirements and receive continuous training to ensure that they have professional communication, coordination and judgment skills, can meet customer needs in a compliant manner, and maintain NOA's reputation for integrity.

2. Confidentiality and Data Protection

NOA is strictly committed to protecting the confidentiality of customer information and respecting the privacy of every customer. To ensure the security of all confidential and sensitive information, all employees and partners must comply with the following confidentiality and data protection regulations:

2.1. Employee Responsibilities

2.1.1. Information Access Rights

Employees can only access confidential information related to their duties, and all access must follow the principle of “least privilege”. No employee may attempt to access sensitive information not related to their work without authorization.

2.1.2. Confidentiality Obligations

All employees are responsible for maintaining confidentiality of all NOA information obtained in the course of their work. This includes but is not limited to business data, financial information, investment plans, strategies and customer information. Employees may not disclose, disseminate or discuss this information to any third party without explicit written authorization.

2.1.3. Data Processing and Protection

Employees must use company-approved security tools and technologies, such as encryption software and secure networks, when processing customer or company data. Any storage, transmission or use of sensitive data must comply with NOA's data security standards.

2.1.4. Data Leakage Handling

Once a possible or actual data leak is discovered, employees must report it to the company immediately. The company will take prompt countermeasures according to established procedures to reduce potential losses and risks.

2.1.5. Training and Awareness

Each employee must participate in regular data protection and confidentiality training to ensure that they are familiar with relevant policies, technical requirements and laws and regulations, and can properly handle and protect sensitive information.

2.1.6. Confidentiality Obligation after Resignation

After the employee terminates the labor relationship with the company, he or she still has the confidentiality obligation. Confidential information obtained during the work at NOA shall not be used or disclosed in any form, and violators will bear legal liability.

2.2 Partner Responsibilities

2.2.1. Selection and Review

NOA will strictly screen and regularly review partners to ensure that they meet the company's data protection standards. Any partner must demonstrate that it has sufficient technical capabilities and management measures to ensure the security and confidentiality of data when handling information related to NOA.

2.2.2. Confidentiality Agreement

All partners must sign a confidentiality agreement with NOA to clarify their confidentiality responsibilities for all shared information. Without the written authorization of NOA, the Partner shall not disclose or use NOA's sensitive information in any form.

2.2.3. Data transmission and storage security

When transmitting or storing NOA's confidential information, the Partner must use encryption technology and other security measures that meet NOA standards. The Partner shall ensure that its employees and any third-party service providers also comply with these requirements.

2.2.4. Response to data leakage

If the Partner finds that the NOA data it handles has been leaked or is at risk of being leaked, it must notify NOA as soon as possible and take appropriate measures to repair it. The Partner may face legal liability in such cases and shall bear the corresponding compensation obligations.

2.2.5. Data processing after termination of the contract

At the end of the cooperation or expiration of the contract, the Partner shall destroy or return all sensitive information related to NOA at the request of NOA. The Partner shall not retain any form of confidential information, and violators will bear legal consequences.

2.2.6. Legal compliance

All partners must comply with applicable international and local data protection regulations and regularly review their compliance status to ensure continued compliance with the latest legal requirements.

2.3. Legal consequences and responsibilities

Any violation of the above provisions, whether by employees or partners, will face corresponding legal responsibilities and internal penalties of the company. The company reserves the right to take legal action, including but not limited to seeking compensation for losses caused by violations. Partners may face contract termination and legal proceedings in the event of violations.

3. Complaints and Dispute Resolution

NOA has an independent complaint handling department to ensure that every complaint is handled promptly and fairly. In terms of dispute resolution, NOA is committed to reaching a satisfactory solution for all parties through open and transparent communication and cooperation.

4. Business Relationships

NOA will explicitly require new or renewed intermediaries, joint venture partners and franchisees to comply with this Code and conduct due diligence on them to fully assess compliance risks. NOA will implement continuous monitoring and regular audits to ensure that these partners meet the relevant requirements of this Code.

5. Fair Labor

NOA complies with labor laws and regulations and other applicable wage and working hour laws. Employees should not be forced or coerced into any form of involuntary labor. NOA does not employ child laborers under the legal age and strictly abides by relevant laws and regulations.

All employees must respect each individual, and NOA does not tolerate any form of discrimination or harassment, including but not limited to discrimination based on race, gender, religion, nationality, age, disability or any other protected characteristic. NOA firmly opposes all forms of abuse, bullying or harassment, and any form of harassment or abuse will be severely dealt with.

6. Health and Safety

NOA is committed to providing a safe and healthy working environment for all employees and minimizing any health, safety and environmental risks in their work. NOA regularly conducts safety training for employees to ensure the physical and mental health of employees, while respecting the labor rights and welfare of employees. NOA encourages employees to report incidents related to health and safety. NOA will record and investigate such incidents and take corrective measures when necessary. No employee will be punished for reporting accidents or pollution incidents.

7. Fair Business Practices

NOA is committed to complying with fair market principles, operating in a fair and open manner, and requires employees to do the following:

7.1 Ensure that NOA and its services are presented in a true manner and do not maliciously make false statements about competitors, or their operations, services, or service products.

7.2 Do not participate in the dissemination of deceptive, misleading or potentially misleading content.

7.3 Oppose any form of commercial espionage. Do not participate in, tolerate or support any form of commercial espionage.

7.4 Data theft is strictly prohibited, which involves illegal acquisition, use or disclosure of confidential data. Strictly comply with all applicable fair competition laws and prohibit any activities that violate antitrust laws or bidding rules. If the company or employees violate these laws, they may face severe civil and criminal sanctions.

7.5 Do not incite, induce or encourage others to violate their confidentiality obligations.

8. Anti-bribery

8.1. Compliance with the law

NOA always adheres to strict compliance with all applicable anti-bribery laws and regulations in the countries and regions where it operates. Every employee must be familiar with and strictly comply with the legal requirements related to their daily work.

8.2. Risk analysis

8.2.1. Regular risk assessment

The Compliance Committee and/or senior management or their authorized representatives in each country of operation must conduct a comprehensive assessment of bribery risks on a regular basis. This assessment process is designed to identify potential bribery risks and develop appropriate control measures to prevent any possible corruption.

8.2.2. Timing of risk assessment

Bribery risk assessment should be conducted in the following circumstances:

8.2.2.1. **New business launch:** Whenever the company plans to launch a new service or enter a new country or region, a comprehensive bribery risk assessment must be conducted to ensure that all possible risks are identified and controlled.

8.2.2.2. **After a major violation occurs:** If the company has a serious violation of the anti-bribery policy or the existing control measures are found to be inadequate, the company must immediately initiate a risk assessment, review the current risk management framework, and develop a new response strategy.

8.2.3. Risk Assessment Process

NOA systematically conducts risk assessments and ensures that such reviews are recorded and archived. Any high-risk areas found during the assessment process should be subject to immediate control measures, including adjusting policies, training employees or introducing new compliance processes.

8.3 Anti-bribery Business Principles

8.3.1. Political donations

8.3.1.1. Prohibition of use to obtain business advantages

All NOA employees shall not make donations directly or indirectly to any political party, political organization or individual in an attempt to obtain improper advantages in business transactions through such donations. Any attempt to influence business decisions through political donations should be strictly prohibited.

8.3.1.2. Transparency and record keeping

All political donations must be recorded in detail and separately classified in the company's financial system to ensure transparency. All such payments should be aggregated and available for review during the organization's internal or external audit process. The company should have a dedicated internal audit mechanism to ensure that political donations are not used as a tool for bribery or business transactions.

8.3.2. Charitable Donations and Sponsorships

8.3.2.1. Preventing Donations from Being Used for Bribery

Charitable donations and sponsorships are part of NOA's social responsibility, but the company must ensure that such actions are not abused or used as an excuse for bribery. No form of charitable donations or sponsorships may be used to directly or indirectly influence business transactions or obtain improper benefits.

8.3.2.2. Transparency and Record Keeping

NOA shall keep detailed records of all charitable donations and sponsorships and maintain these records in separate ledgers. All such payments shall be consolidated for verification during internal reviews and compliance checks. Any transaction involving charitable donations shall follow the internal approval process to ensure transparency and legality.

8.3.2.3. Facilitation Payments

NOA explicitly prohibits the payment of any form of facilitation payments. Facilitation payments are small payments made to ensure or speed up the execution of routine or necessary operations, which are essentially a form of bribery. Therefore, all employees of the company have the responsibility to identify and eliminate any behavior involving facilitation payments. Any violation of this provision will face serious treatment by the company and may result in legal consequences.

8.3.2.4. Gifts, entertainment and other expenses

Any gifts, entertainment and other expenses provided or accepted by NOA employees shall meet reasonable and legitimate standards and shall not affect the fairness of business transactions. Any violation of this provision will be regarded as misconduct and may result in disciplinary measures by the company. The company emphasizes that all employees should maintain a high level of professional ethics and avoid any behavior that may be regarded as improperly influencing transactions.

9. Conflicts of Interest

9.1. A conflict of interest arises when an employee's personal relationships, external interests or activities may affect his or her judgment, objectivity, independence or loyalty to NOA. NOA identifies and manages such potential conflicts and takes appropriate measures to avoid related risks to ensure that the individual interests of employees, departments, management and subsidiaries do not adversely affect NOA's overall decisions and actions.

9.2. NOA provides employees with guidelines to avoid conflicts of interest between the following parties:

9.2.1. Conflicts of interest between NOA and related entities. The entity is the object to which NOA has a financial or commercial interest and needs to provide services;

9.2.2. Conflicts of interest between companies and/or departments under NOA that engage in different business activities, which may provide services to the same client or to each other.

9.3. NOA employees shall not:

9.3.1. directly or through relatives, friends or intermediaries, acquire interests in NOA suppliers, customers or competitors, except for the acquisition of shares in customers, suppliers or competitors on a public stock exchange and only to the extent that it does not have a significant impact on the affairs of customers, suppliers or competitors and does not make the employee overly dependent on their financial situation;

9.3.2. hold any position with competitors or customers;

9.3.3. conduct any company business with any of their family members or individuals or organizations associated with them or their family members;

9.3.4. employ their family members without management approval.

10. Helpline

Employees and external parties may obtain guidance on the implementation, interpretation, or any questions or concerns regarding the implementation of the Compliance Program through the following contact information. At the request of the reporter, any such questions shall be handled confidentially and their anonymity shall be protected to the extent reasonably practicable. The Compliance Committee shall bear the ultimate responsibility and right of interpretation for the investigation and handling of the report.

Email: compliance@noagroup.com

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