## ZHONGTIAN TECHNOLOGY SUBMARINE CABLE CO., LTD Statement on Anti Bribery & Corruption Policy

Zhongtian Technology Submarine Cable Co., Ltd (ZTT) is dedicated to legal compliance, actively promoting and maintaining an Anti-Bribery & Corruption System across its international and domestic operations at all management levels.

## ZTT commits to:

- Adhering to all applicable Anti-Bribery & Corruption laws and regulations.
- Avoiding business success through corrupt behaviors, including bribery or any improper activities.
- Prohibiting the offering, promising, authorization, giving, or acceptance of any form of bribe, commercial or property interest, cash payment, or valuable gift.
- Refraining from receiving money, services, gifts, or other valuable goods (including hospitality) from contractors or suppliers.
- Ensuring compliance with ethical standards and policies when conducting business with the Government or its affiliates.
- Maintaining confidential channels for reporting any suspicion of bribery through the whistleblowing policy.

ZTT commitments include but not limited to the above.

This policy undergoes regular review and is consistently practiced by all ZTT employees and stakeholders.

Hu Ming General Manager January 8<sup>th</sup>, 2024