

Codes of Ethical Conduct of ADDcn Technology Co., Ltd

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1. Purpose and Basis of Establishment:

To guide the conduct of the Company's personnel in line with the ethical standards, and make the company's stakeholders more aware of the company's ethical standards, this Codes is formulated for compliance.

2. Applicable Object:

1. The Company's directors, managers (including general manager and personnel at equivalent level, deputy general manager and personnel at equivalent level, assistant manager and personnel at equivalent level, manager and personnel at equivalent level, head of financial department, head of accounting department, and other persons who are in charge of management affairs and have signature rights for the Company) and other employees.
2. The staff of the preceding paragraph are referred to as "the Company's personnel".

3. Principle of good faith:

The Company and its personnel should abide by the code of ethics in the operation and performance of their duties, and adhere to the positive, enterprising, serious and responsible attitude, abandon departmental selfishness, pay attention to team spirit, and follow the principle of good faith.

4. Prevention of conflict of interest:

1. The Company's personnel shall handle their official duties in an objective and effective manner, and shall not gain improper benefits to himself based upon his or her position or spouse or relatives in the Company.
2. When the affiliates of the personnel referred to in the preceding paragraph lends funds to or provides guarantee for the Company and its subsidiaries, major asset transactions, and purchase (sales) of goods, the personnel of the Company shall take the initiative to explain to the Company whether there is any potential conflict of interest with the Company and its subsidiaries.

5. Self-benefiting practices shall be avoided.

The personnel of the Company shall follow the following rules:

1. It is not allowed to use the Company's property, information or take advantage of its position for

personal gain.

2. It is not allowed to compete with the Company, unless the restriction on non competition is removed with the consent of the shareholders' meeting.
3. When the Company has opportunities to get profits, it has the responsibility to increase the legitimate interests that the Company or its subsidiaries can obtain.
4. Do not engage in any behavior prohibited by the code of conduct or other relevant regulations of the Company.

6. Confidentiality:

The personnel of the Company shall be obliged to keep confidential for the technical or non-technical information of the Company or its subsidiaries, or the information of its customers who purchase (sell) goods, except for being disclosed by authorization or by law. The confidential information includes all unpublished information that may be used or leaked by competitors, resulting in loss to the company, subsidiaries or customers.

7. Fair trade:

1. The Company's personnel shall treat the company's customers, competitors and employees fairly, and shall not obtain improper benefits by manipulating, concealing or abusing the information based on their duties, or making false statements about important matters or other unfair trading methods.
2. The Company's personnel shall not act on behalf of their personal, company or a third-party interest in the course of performing their duties make any request, offer, delivery or receive any form of gifts, entertainment, rebates, bribery or other improper benefits. However, if the gift or entertainment is permitted by social etiquette and customs or Company regulations, this restriction shall not apply.

8. Protect and use the Company assets properly :

The Company's personnel are responsible for protecting the company's assets and shall ensure that they can be used effectively and legally in official business.

9. Follows Laws and Regulations:

1. The company's personnel shall abide by other laws and regulations related to the Company Act, Security Exchange Law and other relevant laws and regulations.
2. The company shall strengthen the advocacy of ethics, and encourage employees to actively report to independent directors, managers, internal audit supervisors or other appropriate personnel when they suspect or find violations of laws and regulations, and provide sufficient information to help the Company to properly handle subsequent matters. In order to encourage employees to report illegal conduct, the Company shall establish a concrete whistleblowing system, allow anonymous whistleblowing, and make employees aware that the Company will use its best efforts to ensure the safety of informants whistleblowers and protect them from reprisals.

3. The company will handle the reported cases in a confidential manner, which will be verified by independent channels, and will spare no effort to protect the informants.

10. Punishment and Relief:

1. When any director or manager violates the code, the company shall deal with it in accordance with relevant regulations, and disclose the date and reason of violation, the violation of code and the handling situation of the violator at the public information observatory in real time.
2. Where the violator is subject to disciplinary actions for violating the Codes, the violator may appeal in accordance with relevant regulations.

11. Procedures for Exemption:

If it is necessary for a director or manager to exempt himself from the provisions of the codes, he / she shall pass a resolution from the Board of Directors, and disclose the date of the Board's approval of the exemption. Besides, the objection or reservation of the Independent Directors, the period of application of the exemption, the reasons and the codes should be published at the public information observatory in real time. So the shareholders can evaluate whether the resolution of the Board of Directors is appropriate. All is to prevent the occurrence of arbitrary or suspicious exemption from compliance with the codes, and ensure that any exemption from compliance with the codes has an appropriate control mechanism, and protect the company.

12. Disclosure Methods:

The company shall disclose the codes on the company's website, annual report, prospectus and public information observatory, and the amended ones shall be done at the same way.

13. Supplementary Provisions:

1. The codes shall be implemented with the approval of the Audit Committee and the approval of the Board of Directors, and shall be submitted to the shareholders' meeting, and the amended ones shall be done at the same way.
2. Any matters not covered in the codes shall be handled in accordance with the relevant laws and regulations.