

G-bits Network Technology (Xiamen) Co., Ltd.

Code of Ethical Business Conduct

Missions and Core Values

Our Missions:

G-bits strives to gather and nurture innovative talent and pursue efficient working methods. We aim to provide global users with original products and services. We wish to create and promote wonderful cultural and entertainment experiences.

Our Values:

Integrity: Focus on long-term goals. Prioritize actions that benefit us in the long run and build positive partnerships.

Clarity: Understand the real needs of our users. Always keep a sharp eye on user insights and desires, shaping our services in response. Our users set the standard for what we do.

Humility: Be modest. Avoid ignorance, arrogance, complacency, and hubris. Embrace open-mindedness and recognize the importance of others.

Elegance: We encourage staff to strive for and enjoy a high-quality lifestyle, and to cherish beauty in all forms.

Integrity is a cornerstone of the G-bits culture. In both our routine operations and external collaborations, G-bits adheres to the highest ethical business standards. We are committed to fostering a culture of integrity in all business

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practices and maintain a zero-tolerance policy towards any behavior that breaches these ethical standards.

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1 Overview

The Code of Ethical Business Conduct (the "**Code**") for G-bits Network Technology (Xiamen) Co., Ltd. ("**G-bits**", the "**Company**" or "**we**") is designed to promote the highest standards of ethics and full compliance with all applicable laws and regulations in the countries in which we operate.

1.1 Scope of Application

The Code applies to all directors, officers, employees and interns of G-bits and its consolidated subsidiaries, whether such individuals work for G-bits on a full-time, part-time, consultative, or temporary basis (including employees outsourced from employment agencies or other entities) (each, an "**Employee**" and collectively, "**Employees**").

The Code also applies to all the business we conduct. G-bits expects its suppliers, contractors, service providers, consultants, and other business partners (collectively, "**Business Partners**") to comply with the Code when providing goods and services to G-bits or acting on our behalf.

1.2 Compliance with the Code

G-bits will provide training to ensure that Employees and Business Partners acknowledge, understand, and adhere to the Code. Based on the Employees' roles and responsibilities, specific training on topics such as anti-corruption and anti-fraud may be necessary.

All managers in G-bits must set a positive example, guarantee that their teams understand and adhere to the Code, and effectively carry out their managerial and supervisory roles.

Any Employees who intentionally violates the Code may face severe disciplinary action by the Company, which could include termination of employment or discontinuation of any service contract, as appropriate. In case of potential legal violation or misconduct, G-bits will cooperate with relevant regulatory authorities to address these issues.

Any violation of the Code by Business Partners may result in the cessation of collaborative relationship with G-bits.

1 Overview

1.3 Regulatory Mechanism

G-bits is committed to establishing effective regulatory mechanism to address ethical risks in business.

Guided by the Audit Committee, the Audit Department routinely inspects and evaluates adherence to regulatory standards and ethical norms within the Company's commercial practices. G-bits commits to conducting thorough triennial audits of the Code, which include all of the Company's operations and extend to all of its consolidated subsidiaries.

G-bits has maintained a well-structured process for accepting reports of violations and granted exclusive authority to the Audit Department for investigation of relevant reported issues; the Audit Department directly reports to the Company's Board of Directors, which guarantees in governance structure that the acceptance and investigation of reported violations are independent and objective.

If you find or suspect that there is any violation of applicable laws, regulations or the Code, please report it to the Audit Department directly.

Reporting Channels:

- ✓ Email: jubao@G-bits.com
- ✓ Helpline: 18250712733
- ✓ [Online Platform](#)



1.4 No Retaliation

G-bits strictly prohibits any form of retaliation against whistleblowers for reporting issues, expressing their perceived correct views, cooperating with investigations or audits, refusing to participate in actions that violate laws, the Code or the Company's policies. Retaliation itself is a violation of the Code and our **Anti-Fraud Policy**, and can be reported under the Code.

1.5 Whistleblower Protection

G-bits fully protects whistleblowers against infringement of their legitimate rights and interests in accordance with relevant laws, regulations, and our **Anti-Fraud Policy**.

2 Integrity and Honesty

2.1 Rules of Integrity

As an important part of G-bits culture, "integrity" requires us to specify corresponding warning lines for behavior. Compliance with the **Anti-Fraud Policy** of G-bits and acting without crossing the warning lines are the basic requirements of G-bits for all employees, which mainly include:

- **Warning line 1: Accepting or soliciting bribes or accepting kickbacks**

Any Employees and their stakeholders (including but not limited to immediate family members) will be considered in violation of breaking this warning line and disciplined accordingly if they accept or solicit any benefits or transfer of benefits from the enterprises or individuals having business interactions with G-bits (including but not limited to gifts, samples, entertainment tickets, membership cards, money, kickbacks in the forms of goods, rebates, employment, house purchase, as well as the travel, reception, entertainment and other activities that are paid for by Business Partners) or accept or solicit any benefits from those under their management or receiving their services.

- **Warning line 2: Practicing fraud and falsification**

Any Employees are deemed as breaking this warning line and disciplined accordingly regardless of whether they have received benefits personally if they have committed any of the acts that:

- (1) Cause G-bits to make payments for any false transactions;
- (2) Involve payments for unjustified purposes, such as payment for bribes or kickbacks.

- **Warning line 3: Misappropriating or transferring the Company's interests**

Any Employees are deemed as breaking this warning line and disciplined accordingly if they have committed any of the following acts:

- (1) Transferring transactions that could benefit the Company to others for personal gain;
- (2) Keeping for themselves or sharing among themselves the discounts, kickbacks, commissions, cash, gifts, brokerage fees and the like derived from the business dealings of the Company;
- (3) Selling the items available from the business of the Company at a price obviously below the market price for the purpose of obtaining benefits;

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(4) Taking advantage of their positions to embezzle, steal, fraudulently obtain or otherwise illegally occupy the property of the Company;

(5) Using the business entertainment expenses, office expenses, travel expenses and other expenses of the Company for personal gains.

- **Warning line 4: Disclosing secrets and transferring benefits**

Any Employees are deemed as breaking this warning line and disciplined accordingly if they have taken advantage of the resources, business channels, trade secrets and intellectual property, among other things of G-bits to engage in for-profit activities or transfer of benefits for themselves or others regardless of whether they have received benefits personally.

Meanwhile, G-bits expects the suppliers and business partners to be acquainted with our integrity requirements.

2.2 Protection of Intellectual Property and Confidential Information

The Company respects, and strictly prohibits the infringement of,

the intellectual property of other parties and requires employees to strictly comply with the prohibition. G-bits is a company specialized in creative planning, R&D, and commercial operation of online games. Therefore, technology and intellectual property are vital to our development. Employees have the responsibility for safeguarding information security and ensuring that:

- (1) All information related to G-bits' business, which is disclosed without authorization, shall be deemed as confidential information, including but not limited to the business plan, proprietary data, financial status, internal correspondence, operation information and staff information of the Company as well as the third-party' s confidential information that G-bits promises not to make public according to cooperation agreements;
- (2) Confidential information should not be disclosed to third parties, nor should it be discussed in public places;
- (3) Confidential information is only known to the specified staff within G-bits and not disclosed to any other persons unless the disclosure is necessary for them who have obtained authority to fulfill work duties.

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2.3 Use and Protection of the Company's Assets

All directors, officers and colleagues should protect and effectively use Company assets, adhere to proper usage policy and ensure that such assets are used exclusively for legitimate commercial purposes.

Company assets include employees' work product, the Company's equipment, vehicles, trademarks, proprietary information, computers, software, as well as any documents, communications or data produced as part of one's employment or in furtherance of Company business.

G-bits reserves the right to recover compensation in case of any willful damage to Company assets, use of Company assets for illegal purposes, failure to fulfill the custody obligations or negligence in preventing further loss.

2.4 Conflicts of Interest

A conflict of interest occurs when personal interests interfere, or appear to interfere, with the interests of the Company. Employees must settle conflicts of interest prudentially and

properly to avoid the occurrence of conflicts of interest in their work. Any conflict of interest that is found to exist or likely exist must be reported to the department directors promptly. If it is affirmed that an Employee is involved in the circumstances of conflicts of interest, the Employee shall cooperate with the Company in making adjustment to avoid any situation that creates a real or perceived conflict of interest. Any Employee, full or part-time, must comply with the following rules.

Do not:

- (1) Employed by a competitor of G-bits or an enterprise causing G-bits to lose business;
- (2) Takes advantage of the property or information of G-bits or the position held in the Company to gain the business opportunities that should be obtained by G-bits;
- (3) Engage in any business activities during work hours that result in financial gain (ownership or otherwise), either directly or indirectly through a spouse or other family member;
- (4) Hold owner's equity in companies that are competitors of G-bits or Business Partners when the investment presents a

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conflict of interest.

2.5 External Communication

With the continuous development of the Company, there has been an increase in the attention and inquiries from organizations, media and other third parties.

Only a small number of designated staff may speak to the media on behalf of G-bits. Employees are prohibited from responding to media inquiries, making public statements, or accepting interviews with external agencies on behalf of the Company without proper authorization.

2.6 Anti-Fraud

G-bits conducts business ethically, honestly, and prohibits fraudulent activity, which includes any use of deception to obtain monetary or personal gain, to avoid an obligation, or to cause loss to another party.

3 People-Oriented Company

G-bits is committed to creating a safe, equal, and diversified workplace for employees. The Company expects all employees to treat colleagues and business partners staying around in equal, polite, and respectful manner so as to facilitate the team cooperation.

3.1 Fair Employment, Anti-Discrimination, and Anti-Unfair Competition

G-bits always adheres to the fair and impartial employment principle in recruiting outstanding talents. We commit to providing a workplace free from discrimination based on an individual's protected status. Protected status refers to an individual's personal characteristics including: gender identity or expression, color, national, age, race, citizenship, religion, sexual orientation, marital civil status, disability, or any other characteristics protected by applicable laws.

G-bits have a zero-tolerance policy toward discrimination and unequal competition in any form.

3.2 Anti-Harassment

No workplace harassment is allowed in G-bits, including but not limited to offending, insulting, gender or racial derogation and sexual harassment.

3.3 Lawful Employment and Protection of Employees' Rights and Interests

G-bits respects and safeguards various legitimate rights and interests of employees and has established relevant internal management policies to ensure our strict compliance with relevant laws and regulations applicable in the place where we conduct business.

G-bits guarantees equal pay to men and women for equal work, safeguards the legitimate rights and interests of female employees, ensures that no differential treatment applies to employees on account of their religious belief, gender identity or expression, age, disability, and other various factors and creates an equal, inclusive and liberal workplace.

G-bits always puts employee safety in the first place and is devoted to creating a harmonious and healthy workplace.

4 Compliance Operation

When conducting business operations in any country or region, G-bits not only complies with local laws and regulations but also steadfastly upholds integrity in its operations. The Company is committed to delivering superior products and services while fulfilling our responsibilities.

4.1 User Information Privacy Protection

G-bits prioritizes the safeguarding of inside information and is equally committed to upholding the legitimate rights and interests of our users and Business Partners. Employees should always fulfill the confidentiality obligations towards user and partner information, respect and protect privacy, and strictly adhere to all applicable laws, regulations, and internal management system. See G-bits User Privacy Policy for more details.

4.2 Anti-Corruption and Anti-Bribery

G-bits upholds integrity and honesty in business operation, and strictly complies with applicable laws and regulations. G-bits prohibits bribery, kickbacks, and corruption in all forms.

Employees may not, whether directly or indirectly, provide, offer, solicit, or accept any improper benefits from any individual, entity, or organization.

Any Business Partners who provide employees with bribes, kickbacks, or other improper benefits, G-bits will terminate the cooperation immediately and blacklist it.

4.3 Gifts and Entertainment

Employees are required to refuse any gifts or cash provided by Business Partners or clients in business interactions.

If declining the gift or cash is culturally inappropriate or impossible, employees shall turn it over to the company. The Administrative Department will handle it on a unified basis according to **Gift Acceptance Policy**.

Entertainment should not go beyond the necessity for maintaining business relationships or facilitating lawful business dealings. Accepting entertainment should not affect normal judgment and decision-making. Employees may not accept frequent or luxury entertainment.

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4.4 Fair Competition

G-bits seeks to compete and achieve success by developing fine games, rather than using immoral or illegal conducts. Therefore, Employees shall respect the rights of users, suppliers, and competitors, and engage in fair dealings or competition without seeking improper benefits.

4.5 Financial Integrity and Record Keeping

Financial integrity is essential to the healthy operations of the Company. We make business decisions based on accurate, clear, and complete records, complying with all applicable laws and regulations on financial reports, to defend the company's reputation and protect the rights and interests of users and related parties.

We guarantee our adherence to relevant standards and policies on financial reports, compliance with the requirements on record keeping under applicable regulations, and completeness and accuracy of financial statements.

Business records should be kept complete and accurate. Employees have the responsibility to maintain and preserve work

records as required under applicable laws, regulations, and company policy, and provide work records in a timely and complete manner when required by the Company. Company and individual may be required to take corresponding legal liability for breach of the requirements due to negligence or other reasons.

4.6 Prohibition of Insider Trading

Before the disclosure of insider information, Employees having knowledge of the insider information may not trade the securities of the Company, disclose the information, or provide suggestions to others for trading the stocks of the Company. Employees should comply with the provisions on securities trading and information confidentiality under the Securities Law of the People's Republic of China, the Administrative Measures for Information Disclosure by Listed Companies as well as other applicable laws and regulations.

4.7 Corporate Social Responsibility and Sustainability

G-bits attaches high importance to corporate social

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responsibility and has long been committed to public welfare and charity undertakings. The Company encourages every employee to actively participate in the public good and give back to the community while pursuing their own development.

G-bits actively responds to the national call for environmental protection and green operation practices. The Company advocates for employees to work green, travel low-carbon, reduce food waste, and reduce carbon footprint with practical actions.

If you have any questions concerning this Code or find any misconduct and violation of regulations, please contact the Audit Department through the aforementioned reporting channels.