

Chlitina Holding Limited

Code of Ethical Conduct

1. Purpose and Basis for Establishment

This Code of Ethical Conduct is established to guide the behavior of the Company's Directors, Supervisors, and Managerial Officers—including the General Manager and equivalents, Deputy General Managers and equivalents, Assistant General Managers and equivalents, heads of Finance and Accounting Departments, and other persons authorized to manage company affairs and sign on behalf of the Company—in accordance with ethical standards. It is also intended to help stakeholders better understand the Company's ethical principles. The Company recognizes the necessity of adopting this Code as a guideline for adherence.

2. Scope of the Code

Taking into account its particular circumstances and needs, the Company has adopted this Code of Ethical Conduct, which covers at a minimum the following eight areas:

(1) Prevention of Conflicts of Interest

A conflict of interest arises when personal interests interfere or may interfere with the interests of the Company as a whole. For example, when a Director, Audit Committee member, or Managerial Officer is unable to conduct Company affairs objectively and efficiently, or when they—due to their position—cause themselves, their spouse, parents, children, or relatives within the second degree of kinship to receive improper benefits. The Company shall pay particular attention to loans or guarantees involving related parties, significant asset transactions, or transactions involving purchases and sales. The Company shall establish policies to prevent conflicts of interest and provide appropriate channels for Directors, Supervisors, and Managerial Officers to proactively disclose any potential conflicts of interest with the Company.

(2) Avoidance of Misuse of Corporate Opportunities

The Company shall prohibit Directors, Audit Committee members, or Managerial Officers from:

1. Using Company assets, information, or their positions for personal gain;
2. Engaging in activities for personal benefit by leveraging Company assets, information, or their positions;
3. Competing with the Company. When business opportunities arise, such individuals have a duty to help the Company obtain legitimate and lawful benefits.

(3) Duty of Confidentiality

Directors, Audit Committee members, and Managerial Officers shall maintain the confidentiality of information related to the Company or its customers and suppliers, unless disclosure is authorized or legally required. Confidential information includes any undisclosed information that may be of value to competitors or that could harm the Company or its clients if disclosed.

(4) Fair Dealing

Directors, Audit Committee members, and Managerial Officers shall treat the Company's customers, suppliers, competitors, and employees fairly. They must not obtain improper benefits through manipulation, concealment, abuse of confidential information obtained through their position, misrepresentation of material facts, or any other unfair business practices.

(5) Protection and Proper Use of Company Assets

All Directors, Audit Committee members, and Managerial Officers have a responsibility to protect the Company's assets and ensure their efficient and lawful use for business purposes. Theft, carelessness, or waste directly harms the Company's profitability.

(6) Compliance with Laws and Regulations

The Company shall strengthen compliance with securities laws and all other applicable regulations.

(7) Encouragement to Report Illegal or Unethical Conduct

The Company shall promote ethical awareness internally and encourage employees to report suspected violations of laws, regulations, or this Code to Audit Committee members, managerial officers, the head of internal audit, or other appropriate personnel. To foster reporting, the Company shall establish a specific whistleblower mechanism and ensure that whistleblowers are protected against retaliation.

(8) Disciplinary Measures

Any violation of this Code by Directors, Audit Committee members, or Managerial Officers shall be handled in accordance with disciplinary measures set forth in this Code. The Company shall disclose on the Market Observation Post System (MOPS) the date of violation, the nature of the misconduct, the provisions of the Code that were violated, and the actions taken. Furthermore, the Company shall establish an appeals mechanism to provide remedies for individuals subject to disciplinary actions.

3. Procedures for Granting Waivers

The Code shall stipulate that any waiver for Directors, Audit Committee members, or Managerial Officers from complying with this Code must be approved by resolution of the Board of Directors. The Company shall promptly disclose on the Market Observation Post System the date of the Board resolution, any dissenting or qualified opinions of Independent Directors, the period of the waiver, the reasons for the waiver, and the applicable criteria. This ensures that shareholders can evaluate the appropriateness of the Board's decision and that waivers are granted only under strict and controlled circumstances to protect the Company's interests.

4. Disclosure

The Company shall disclose this Code of Ethical Conduct—and any amendments thereto—on its official website, in the annual report, in the public offering prospectus, and on the Market Observation Post System.

5. Implementation

This Code shall take effect upon approval by the Board of Directors and shall be submitted to all Independent Directors and presented at the Shareholders' Meeting. The same procedure shall apply to any amendments.

6. Supplementary Provisions

This Code was adopted on March 29, 2013.

This Code was amended and approved by the Board of Directors on March 12, 2015.