

海康威视道德与商业行为准则
Hikvision Code of Ethics and Business
Conduct

合规官致辞

海康威视（以下或称“公司”）秉承“专业、厚实、诚信”的经营理念，践行“成就客户、价值为本、诚信务实、追求卓越”的核心价值观，通过不断创新的产品和技术，为人类的安全和发展开拓新视界。

作为一家全球化经营的科技企业，我们不断探索关于道德伦理、规则与技术发展的思考，努力在全球不同文化、价值观和规则体系中寻求共识和理解，希望我们所追求的技术进步能为社会带来善意和福祉。

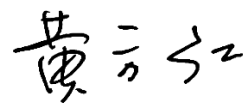
我们致力于成为一家受人尊敬的全球化企业，为此，我们不断提升自身眼界和格局，以符合更高标准的商业道德的方式开展业务，奉行诚实守信、合法合规的经营理念，并以此作为公司在全球范围内稳健、长远发展的基石。

《海康威视道德与商业行为准则》（以下简称“准则”）阐述了我们的商业价值观，制定了公司在世界各地开展业务的道德标准、基本政策和商业行为规范。我们希望每一位海康人能都熟读并始终如一地践行之。恪守本准则也有助于营造互相尊重、正确行事、信守承诺的企业文化。

感谢您为公司的信誉和长远发展做出的不懈努力！

唯有因善而见，所致者方为良知。

首席合规官 高级副总裁



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1 概述、目的与范围

本准则涵盖了公司一系列的商业道德准则、价值观和行为规范及要求等，为公司的商业选择和员工的业务行为提供指引，以营造诚信、尊重、公正、向善的企业文化和工作环境。本准则旨在帮助公司和员工正确行事，并识别在业务经营和日常工作中可能出现的违反道德准则、法律法规和制度规范的情形。

本准则适用于海康威视及其子公司的所有董事、监事、高级管理人员和全体员工。此外，为海康威视提供服务的其他人员应按合同的规定受本准则相关内容的约束。我们也倡导并期望我们的客户、合作伙伴遵循相似的价值观和商业道德标准。

同时，为配套本准则的实施和贯彻执行，公司制定了一系列政策、规则、程序或执行细则（统称“配套规则”），我们也同样需要遵循。

2 我们的价值观与基本原则

本准则承载了公司的道德标准、价值观和基本行为原则，展现了公司文化，指引我们在日常经营活动中正确行事，在业务抉择中向“善”而为。我们必须始终坚持以下这些商业道德标准和基本价值观：

2.1 诚实守信

诚信是人类社会的良好品德，也是海康威视一贯秉承的核心价值观。诚信是公司业务发展的基础，公司未来的成长也取决于所有员工能否持之以恒地恪守诚实守信的价值观。

2.2 合规经营

公司坚持合法合规的经营理念，恪守商业道德。公司应当遵循业务运营所在国家的法律法规及政策、规范要求以及适用的国际标准，履行企业应尽的合规义务，以此作为公司在全球范围内稳健、长远发展的保证。

2.3 平等与尊重

海康威视致力于创造互相尊重与平等信任的工作环境，遵守所适用的有关平等就业机会和安全工作环境的法律、法规和政策，不允许工作环境中存在歧视或骚扰的行为。同时，海康威视尊重和保护人权，在适当的尽职调查和合理的商业判断下，尽力发现并努力避免业务活动中可能出现的人权问题。

2.4 承担社会责任

海康威视致力于将企业社会责任与可持续发展理念融入业务之中，以创新的产品和服务，助力生态健康和环境保护，承担社会发展责任，从而促进人类健康安全与可持续发展。

3 平等相待，尊重他人

3.1 良好的工作环境

海康威视致力于创造和保持诚实、正直、互相尊重与信任的工作氛围，维护健康、安全、高效的工作环境。我们努力坚持一种开诚布公和诚实的沟通方式。我们不允许工作环境中存在暴力、不安全、不道德、不恰当或其它影响正常工作秩序的行为。

3.2 平等无歧视

我们坚持公平和无歧视对待员工的原则，不允许工作环境中存在因种族、肤色、宗教、性别、年龄、国籍、遗传、残障或其他与公司合法、正当利益无关的因素而受到歧视或骚扰的行为。海康威视遵守业务所在国家和地区所适用的有关平等就业机会的法律、法规和政策，为求职者和员工提供平等的工作机会。

3.3 反骚扰

海康威视坚持为所有员工创造一个积极、相互尊重、无骚扰的工作环境。我们不容忍工作场景中出現任何形式的不合法、不安全、不道德的骚扰行为，包括但不限于：

- 具有暴力、胁迫、威吓、虐待、侮辱诽谤、恶意偏见等性质的行为；
- 性骚扰行为，包括不被接受的性暗示、性挑逗、要求性好处或其它以言语、姿势或身体接触等形式表现的具有性本质的不当行为；
- 其它对员工合法人格权益造成侵害的违法或违反公司制度的行为。

如任何员工遭遇或获悉上述情形，可向上级主管、人力资源部、法律与合规部，以及本准则第7.2条规定的途径进行举报和申诉，公司将在保护举报人隐私的前提下，积极响应，及时调查，采取必要的纠正或补救措施，依法合规处理。公司保护善意的举报人，确保举报人不遭受报复。

3.4 严禁人口贩卖、使用童工和强迫劳动

海康威视强烈反对并严格禁止在公司业务活动中出现人口贩卖、使用童工、强迫劳动等行为，同时致力于杜绝在我们的供应链中出现类似情形。公司禁止包括体罚在内的非人道待遇，禁止雇用业务所在国家法定的未成年人从事任何工作。我们敦促和要求我们的合作伙伴亦能满足上述要求。

3.5 尊重与保护人权

海康威视致力于人权保护。我们尊重《世界人权宣言》《公民及政治权利国际公约》《经济、社会和文化权利国际公约》以及《国际劳工组织关于工作中的基本原则和权利宣言》规定的各项人权。同时，

我们参照《联合国工商企业与人权框架指导原则》等国际公认的标准，将这些规定融入到我们的工作流程和政策中，加强尽职调查和商业判断的能力，尽力避免我们的产品和服务被用于妨碍人权的行爲，以此不断提升我们商业活动中人权保护的合规性。同时我们也向我们的客户、合作伙伴传递公司尊重人权的价值观，并希望他们也能这样做。我们希望通过公司的努力，不断推动行业规范的建立、规则的更新，从而助力推进人权保护的工作。

3.6 尊重个人隐私，保护个人信息

海康威视尊重所有个人的隐私和尊严，致力于保护员工、客户或其他任何人有关的个人隐私和个人信息。我们必须严格遵守个人隐私和个人信息所适用的法律法规和公司的政策、程序和要求，以保护公司接收到的个人信息，包括公司员工、客户或其他任何人的信息，以防止未经授权的访问、销毁、使用、修改或披露。

4 诚信合规地经营业务

作为全球化经营的企业，海康威视致力于在全球范围内以合法合规并符合较高商业道德标准的方式开展业务。

我们所应遵循的合法合规的领域非常广泛，包括但不限于劳工权益、人权保护、环境保护、反贿赂与反腐败、出口管制和制裁、公平竞争与反垄断、投资、贸易、外汇、合同、消费者保护、隐私与数据保护、知识产权、商业秘密、会计、税务等各个方面。

违反法律法规对公司和涉及的员工都将产生严重后果，因此每一位员工都有责任了解并遵守所有适用的法律法规。法律法规十分复杂且会不断变化，也会因地域国别的不同而有所差异。如果本准则内容与当地法律法规不同，我们一般应当遵循更严格的标准。如果您认为本准则的要求与当地法律法规相冲突，请联系法律与合规部。

4.1 对待客户与合作伙伴

海康威视致力于与我们的客户、合作伙伴建立互利互惠的关系，在业务交往过程中，我们应正确地践行和传递公司的愿景、使命、价值观。我们倡导并期望我们的客户与合作伙伴能够遵守与我们相同或相似的行为准则和商业道德标准。

公司倡导以公平、诚实和互相尊重的方式与合作伙伴进行业务来往。在我们的营销活动以及与客户业务交往过程中，我们应公平和准确地展现公司的产品和服务。我们希望我们的供应商遵守所有适用的法律和法规，要求供应商履行相应的行为准则和责任规范，并对其直接供应链负责，以满足必要的法律、法规和道德规范的要求。

如果公司供应商、承包商、分销商、顾问及与公司有业务来往的主体或个人违反法律法规或行为

准则，将承担与公司合作关系终止的风险。

4.2 廉洁建设

反贿赂与反腐败是构建廉洁、透明商业社会的基本准则，也是海康威视的价值观和企业文化的内在要求，同时体现了公司管理层对于道德、诚实、守信经营的承诺。海康威视禁止贿赂与腐败的行为，每一位员工必须专业、公正、廉洁、诚信地开展公司业务。

海康威视依靠创新产品、优质的质量和服务来赢取业务，而非通过不道德、不正当或非法的方式。因此，员工不得直接或间接向政府官员、客户等第三方提供、承诺、给予或授权提供金钱或其它任何高价值物品以获取业务。同时，也不得利用工作之便诱请、要求、接受、获得不正当利益。

公司致力于实施透明的馈赠和招待标准，并要求所有的馈赠和接待都被严格准确地记录。对于具体的馈赠标准限额可进一步参考《海康威视全球反贿赂与反腐败手册》。如果我们的政策与当地的法律要求不一致，应当遵守更严格的规定。我们应该进一步考虑到礼物的接收者受到(更严格的)内部规则的约束。如有疑问，请联系法律与合规部。

4.3 公平竞争

海康威视积极参与市场竞争，开拓业务，同时遵守业务所在地适用的公平竞争法律法规，倡导公平、正当竞争。我们应当在市场竞争业务活动中保持商业道德，处理好与竞争对手的关系，同时避免参与或实施垄断等限制和阻碍公平竞争的行为。我们在商业往来中应审慎识别反垄断合规风险，始终以遵守法律法规和公司反垄断合规政策的方式行事。

公司鼓励员工以积极进取的态度开展业务，但员工从事公司活动及参与市场竞争时，不仅要积极、有效，也要符合法律法规与道德规范。员工在对市场竞争信息进行收集和分析时，应尊重他人商业秘密、遵循公司相关制度和规范要求，不得通过非法或其他不正当行为获取他人商业秘密。

4.4 出口管制与经济制裁

在公司开展业务的各个国家和地区，都有各种法律和法规约束进出口活动。在这些法律和法规中，有许多规则限制或禁止将公司的特定产品(包括硬件、软件和技术)运输或转移给特定的目的地、实体、自然人等。很多情况下，法律要求提供出口许可证或其他相应的政府批文后方能运输或转移。海康威视致力于遵守业务经营所在国家和地区适用的进出口管制与经济制裁法律法规。我们在日常业务开展中涉及产品(包括硬件、软件和技术)进出口或转移给受限对象，应当遵守适用的出口管制、经济制裁法律法规以及公司制定的相关的政策与流程。

4.5 数据保护

海康威视十分重视对客户、用户、员工等相关方的个人数据保护，并致力于以符合业务所在国家和地区的法律及道德伦理为标准处理个人数据。公司制订发布了《海康威视个人数据保护准则》等标准文件，规定了公司在全球范围开展业务过程中以及公司员工的日常活动中涉及个人数据处理时的原则和基本要求。

4.6 反洗钱

洗钱是指将犯罪（如毒品犯罪、黑社会性质的组织犯罪、恐怖活动犯罪、走私犯罪、贪污贿赂犯罪等）所得的非法资金通过金融机构和商业流通方式以各种手段掩饰、隐瞒资金的来源和性质，使其在形式上合法化的行为。

海康威视坚持与资金来源合法的、声誉良好的客户以及商业伙伴进行业务往来。公司不为洗钱活动提供便利。为避免此类问题的出现，员工必须时刻警惕并及时报告客户和商业伙伴的可疑行为。员工还必须遵守适用于交易和合同的现金与付款的所有会计、簿记与财务报告规定。

4.7 准确的记录和报告

所有与海康威视有关的财务文件、报告和条目必须完整和准确。这包括任何内部或外部提交的报告或其他文件，如产品测试、销售、营业收入和成本、研究和服务报告。我们必须在任何时候避免作出任何虚假或误导性的陈述、声明、报告、文件等。

5 保护公司资产和合法利益

5.1 保护公司资产、保密信息

公司投入大量的时间和资源来开发和维护用于公司业务的资产。我们有责任保护公司的资产并确保其有效利用，包括有形资产、知识产权、商业秘密和其他资产。盗窃公司资产、疏忽大意及浪费，均会直接或间接损害海康威视的利益。所有员工只能将公司资产用于合法的商业目的，并且应当采取措施防止海康威视资产被损害、被非法占有或不当使用。

维护机密和专有信息是公司的一项重要制度，我们必须遵守与隐私和信息安全相关的所有适用法律和法规，保护公司的机密信息不受损害。

5.2 尊重和保护知识产权、商业秘密

尊重和保护知识产权不仅是法律法规的要求，也是公司的重要原则。员工应了解并遵守关于商业秘密、专有信息及其它知识产权的法律法规，尊重他人知识产权，避免不当使用他人知识产权。我们有责任保护并避免不当使用和披露他人的保密和专有信息。未经第三方明确授权，不得将其保密或专

有信息用于商业目的。

5.3 避免利益冲突

所有员工都应当诚信勤勉地履行公司赋予的职责，必须避免任何可能涉及个人和公司利益的冲突或可能发生冲突的情形。此外，海康威视禁止所有员工利用自己在公司的职位或与客户或合作伙伴的关系谋取个人利益，或为其近亲属谋取利益。

当员工的利益、职责、义务或活动，或近亲属的利益与公司的利益相冲突或不相容时，利益冲突就会发生。

可能会引起利益冲突的情况无法一一穷尽，如有疑问，可以进一步参考员工商业行为规范、员工手册和公司制订的相关细则，或联系法律与合规部。

5.4 禁止内幕交易

在正常的业务过程中，员工可能会了解到关于海康威视或其他公司的尚未公开的信息。为了个人利益而使用或披露这些非公开或内幕信息不仅是不道德的，而且可能违反法律。违反这些法律可能会导致民事或刑事处罚，公司禁止内幕信息的不当使用和披露。如有疑问，可联系法律与合规部。

6 承担社会责任与保护环境

海康威视致力于将企业社会责任与可持续发展理念融入我们的业务之中，以创新智能的产品和服务，持续维护生态健康和环境保护。同时，我们深知公司所肩负的与社会共同发展和进步的责任，秉持“善”的信念，回馈社会以“善”笃行。公司不断以创新的产品和解决方案来支持环境保护与生物多样性，从而为人类打造更加和谐、可持续发展的生存环境。

7 执行指引

7.1 准则的管理

为了使本准则符合不同国家或地区的法律，公司将每年对准则内容进行审查，并保留随时修改本准则的权利。法律与合规部负责本准则的解释和日常维护。

海康威视尽一切合理的努力防止违反本规范的行为发生。违反本准则和海康威视配套规则的员工可能会受到纪律处分，包括终止雇佣关系，依据法律规定还可能会受到民事甚至刑事法律的追诉。

7.2 提出问题与举报违规

我们欢迎就本准则的内容提出任何问题，并报告可能违反法律法规、本准则或海康威视配套规则

的行为。对于可疑的违规行为可通过以下途径报告：

内审部（邮箱：jubao@hikvision.com 电话：0571-86611816）

合规部（邮箱：compliance@hikvision.com）

7.3 **禁止报复政策**

我们保护任何善意举报人，任何人不得对任何善意举报可能违反法律法规、本准则或海康威视其它制度，或对质疑正在进行或提议的商业行为、或参与调查的人进行报复。

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Tone of Compliance Officer

Hikvision (hereinafter referred to as “the Company”) adheres to the business philosophy of “professionalism, honesty and integrity”. Hikvision is committed to serving various industries through its cutting-edge technologies of machine perception, artificial intelligence, and big data, leading the future of Internet of Things.

As a globalized technology company, we are constantly exploring ideas between ethics, rules and technological development, and strive to seek balance and understanding in different cultures, values and rule systems around the world. We hope that the technology innovations we pursue can bring goodwill and well-being to the society.

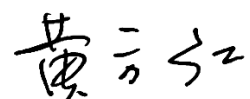
We are committed to being a respected global company, and to this end, we continue to upgrade our vision and structure to conduct business in a manner consistent with higher standards of business ethics. We stick to the business philosophy of honesty and trustworthiness, legal compliance, and take this as the cornerstone of the company's steady and long-term development in world wide.

Hikvision Code of Ethics and Business Conduct (hereinafter referred to as “the Code”) expounds our business values and shapes the company’s ethical standards, basic policies and business codes for our business operations around the world. We hope that every Hikvision family member will be familiar with the Code and practice it consistently. Adherence to this code also contributes to a corporate culture of mutual respect, correct conduct, and commitment.

Thank you for your sustained efforts for the company's reputation and long-term development!

It is only by virtue of seeing, that the cause is conscience.

Chief Compliance Officer, Senior Vice President



1 Overview, Purpose and Scope

The Code covers a series of business ethics, values and codes of conduct and requirements of the company, providing guidance for the company's business choices and business practices of employees, so as to create a corporate culture and working environment that is honest, respectful, fair, and good-oriented. The purpose of the Code is to help companies and employees act correctly and to identify possible violations of ethics, laws and regulations, and policies in business operations and daily work.

The Code applies to all directors, supervisors, senior managers and all employees of Hikvision and its subsidiaries. In addition, other persons providing services to Hikvision shall be bound by the relevant parts of the Code in accordance with the provisions of the contract. We also expect our customers and partners to follow similar values and business ethics standards.

Meanwhile, the company has distributed a series of policies, rules, procedures or implementation rules (collectively referred to as "Supporting Rules"), which we also need to follow.

2 Our Values and Basic Principles

The Code carries the company's ethical standards, values and basic principles of conduct, demonstrates the company's culture, guides us to act correctly in daily business activities and act towards "goodness" during the business choices. We must always adhere to the following business ethics standards and fundamental values.

2.1 Honesty and Trustworthiness

Honesty is the core value that Hikvision has always adhered to since the beginning of the Company. Honesty is the foundation of the company's business development. The future growth of the company also depends on whether all employees can abide by the values of honesty and trustworthiness.

2.2 Compliance Management

The company adheres to the business philosophy of legality and compliance, and scrupulously abides by business ethics. The company shall comply with the laws, regulations, policies of the country where the company operates, as well as applicable international standards, and fulfill its due compliance obligations, as the foundation for the company's steady and long-term development on a global company.

2.3 Equality and Respect

Hikvision is committed to creating a working environment of mutual respect and equal trust, in compliance with applicable laws, regulations and policies regarding equal employment opportunity and safe work environments where discrimination or harassment is not tolerated in the working environment. Meanwhile, Hikvision respects and protects human rights and tries its best to screen and avoid possible human rights concerns in its business activities under appropriate due diligence and reasonable business judgment.

2.4 Social Responsibility

Hikvision is committed to integrating corporate social responsibility and sustainable development concepts into our business, promoting ecological health and environmental protection, assuming social development with innovative products and services, so as to promote human health, safety and sustainable development.

3 Treat Equally and Respect Each Other

3.1 Good Working Environment

Hikvision is committed to creating and maintaining a work atmosphere of honesty, integrity, mutual respect and trust, and to maintaining a healthy, safe and efficient working environment. We strive to adhere an open and honest way of communication. We do not tolerate behaviors which are violent, unsafe, unethical, inappropriate, or may affect the good working order.

3.2 Equality, Non-discrimination

We adhere to the principle of fair and non-discriminatory treatment of employees, and do not allow discrimination or harassment in the work environment on grounds of race, color, religion, gender, age, nationality, heredity, disability or other factors unrelated to the legal and legitimate interests of the company. Hikvision abides by the laws, regulations and policies on equal employment opportunities applicable in the countries and regions where it operates and provides equal work opportunities for job seekers and employees.

3.3 Anti-Harassment

Hikvision insists on creating a positive, respectful, and non-harassing working environment for all employees. We do not tolerate any form of illegal, unsafe, or unethical harassment in the workplace, including but not limited to:

- Behaviors of violence, coercion, intimidation, abuse, insults and slander, malicious prejudice, etc.;
- Sexual harassment, including unacceptable sexual suggestion, sexual provocation, demanding sexual favors, or other improper behaviors of a sexual nature in the form of words, gestures, or physical contact;
- Other acts that violate the law or violate the company's system that infringe upon the legitimate personality rights of employees.

If any employee encounters or is aware of the above situation, he or she can report and appeal to his or her manager, the Human Resources department, the Legal and Compliance department, and the channels specified in Article 7.2 of the Code. On the condition of protecting the privacy of thereporter, the Company will respond positively, investigate promptly, take necessary corrective or remedial measures, and deal with them in

compliance with laws and regulations. The Company protects well-meaning reporters from retaliation.

3.4 Prohibition of Human trafficking, Child Labor and Forced Labor

Hikvision strongly opposes and strictly prohibits human trafficking, child labor, forced labor, etc. in the company's business operations, and is committed to eliminating similar situations in our supply chain. The company prohibits inhuman treatment including corporal punishment, and prohibits employing minors legally in the country where the business is located to engage in any work. We urge and demand that our partners also meet the above requirements.

3.5 Respect and Protection of Human Rights

Hikvision is committed to the protection of human rights. We respect Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, and ILO Declaration on Fundamental Principles and Rights at Work. Meanwhile, with reference to internationally recognized standards such as Guiding Principles of the United Nations Business Enterprise and Human Rights Framework, we integrate these provisions into our work processes and policies. We strengthen our due diligence and business judgment, and seek to avoid our products and technologies being abused and used in a manner that violate human rights. We therefore strive to continuously improve human rights compliance in all our business activities. Meanwhile, we convey the company's values of respecting human rights to our customers and partners and expect them to do the same. We hope that through the company's efforts, we will continue to promote the establishment of industry norms, rules update, thus helping to advance the protection of human rights.

3.6 Respect Personal Privacy and Protect Personal Information

Hikvision respects the privacy and dignity of all individuals and is committed to protecting the privacy and personal information of employees, customers, or anyone else. We must strictly comply with the laws, regulations, company's policies, procedures and requirements applicable to personal privacy and personal information, to protect the personal information received by the company including information about company employees, customers, or anyone else, so as to prevent unauthorized access, destruction, use, modification, or disclosure.

4 Conduct Business with Integrity and Compliance

As a globally operating company, Hikvision is committed to conducting business around the world in a manner that is legal, compliant and consistent with high standards of business ethics.

We should follow a wide range of legal compliance areas, including but not limited to labor rights, human rights protection, environmental protection, anti-bribery and anti-corruption, export controls and economic

sanctions, fair competition and anti-monopoly, investment, trade, foreign exchange, contracts, consumer protection, privacy and data protection, intellectual property rights, trade secrets, accounting, taxation and other aspects.

Violations of laws and regulations will bring serious consequences for the company and the employees involved, so it is the responsibility of every employee to understand and comply with all applicable laws and regulations. Laws and regulations are complex and constantly changing, and vary by region and country. If the content of the Code is different from the local laws and regulations, we should generally follow the higher standards. If you believe that the requirements of the Code conflict with local laws, please contact the Legal and Compliance Department.

4.1 Treat Customers and Partners

Hikvision is committed to establishing mutually beneficial relationships with our customers and partners. In the process of business exchanges, we should correctly practice and deliver our vision, mission, and values. We advocate and expect our customers and partners to abide by the same or similar codes of conduct and business ethics standards as we do.

The company advocates conducting business dealings with partners in a fair, honest and respectful manner. We should display our products and services fairly and accurately in our marketing activities and business dealings with customers. We expect our suppliers to comply with all applicable laws and regulations, require them to fulfill the corresponding codes of conduct and responsibility specification, and to be accountable for their direct supply chain, to meet the requirements of necessary laws, regulations and codes of ethics.

If the company's suppliers, contractors, distributors, consultants and entities or individuals who do business with the company violate laws, regulations or codes of conduct, they will bear the risk of termination of the partnership with the company.

4.2 Clean Construction

Anti-bribery and anti-corruption are the basic principles of building a clean and transparent business society, as well as the internal requirements of Hikvision's values and corporate culture, and reflects the company's commitment to ethical, honest, and trustworthy operations. Hikvision prohibits bribery and corruption. Every employee must conduct the company's business in a professional, fair, honest and honest manner.

Hikvision relies on innovative products, superior quality and service to win orders, rather than through immoral, improper or illegal ways. Therefore, employees shall not directly or indirectly offer, promise, give or authorize the provision of money or any other high-value items to a third party, such as government officials or customers, for the purpose of obtaining business. Meanwhile, it is not allowed to use the convenience of work to induce, request, accept, or obtain illegitimate benefits.

The company is committed to implementing transparent standards for gifts and hospitality and requires all gifts and hospitality to be strictly and accurately recorded. For specific standard limits on gifts, please further

refer to Hikvision Global Anti-bribery and Corruption Manual. If our policy is inconsistent with the local legal requirements, stricter regulations should be observed. We should further consider that the recipient of the gift is subject to (stricter) internal rules. If in doubt, please contact the legal and compliance department.

4.3 Fair Competition

Hikvision actively participates in market competition, develops its business, abides by laws and regulations applicable to fair competition in the place where it operates, and advocates fair and just competition. We should maintain business ethics in the market competition and business activities, deal with the relationship with competitors, and avoid the participation or implementation of monopoly and other behaviors that restrict and hinder fair market competition. We should prudently identify the anti-monopoly compliance risks in our business dealings and always act in accordance with laws, regulations and the company's anti-monopoly compliance policies.

The company encourages employees to conduct business in a positive and enterprising attitude. However, when employees engage in company activities and participate in market competition, they should not only be active and effective, but also comply with laws, regulations and ethical standards. When collecting and analyzing market competition information, employees should respect the trade secrets of others, comply with relevant rules and regulations of the company, and not obtain trade secrets from others through illegal or other improper acts.

4.4 Export Controls and Economic Sanctions

In each country and region where the company operates, there are various laws and regulations governing import and export activities. Many of these laws and regulations restrict or prohibit the shipment or transfer of specific company products (including hardware, software and technology) to specific destinations, entities, natural persons, etc. In many cases, the law requires an export license or other appropriate government approval before shipment or transfer. Hikvision is committed to complying with the laws and regulations of import and export control and economic sanctions applicable to the countries and regions where the business operates. When our daily business development involves the import and export of products (including hardware, software and technology) or transfer to restricted objects, we shall comply with applicable export controls, economic sanctions laws and regulations as well as relevant policies and procedures established by the company.

4.5 Data Protection

Hikvision attaches great importance to the personal data protection of customers, users, employees and other relevant parties, and is committed to processing personal data in accordance with the legal and ethical standards of the countries and regions where the business operates. The company has formulated and issued standard documents such as the "Hikvision Personal Data Protection Code", which stipulates the principles and basic requirements for personal data processing in the company's global operations and in the daily activities of its employees.

4.6 Anti-moneylaundering

Money laundering refers to formal legalization of illegal funds obtained from crimes (such as drug-related crimes, organized crimes of underworld nature, terrorist activities, smuggling crimes, corruption and bribery crimes, etc.) through financial institutions and commercial circulation by various means to cover up and conceal the source and nature of funds.

Hikvision insists on doing business with customers and business partners with legal capital sources and good reputation. The company does not facilitate money laundering. Employees must be vigilant and promptly report suspicious behaviors of customers and business partners to avoid such problems. Employees are also required to comply with all accounting, bookkeeping and financial reporting requirements applicable to cash and payments for transactions and contracts.

4.7 Accurate Records and Reports

All financial documents, reports and entries related to Hikvision shall be complete and accurate. This includes any reports or other documents submitted internally or externally, such as product testing, sales, revenue and costs, research and service reports. We must refrain from making any false or misleading statements, declarations, reports, documents at any time.

5 Protect the Company Assets and Legitimate Interests

5.1 Protect Company Assets and Confidential Information

The company devotes a great deal of time and resources to developing and maintaining assets for its business. We have the responsibility to protect the company assets and ensure their effective use, including tangible assets, intellectual property, trade secrets and other assets. Theft of company assets, negligence and waste, will directly or indirectly harm the interests of Hikvision. All employees shall use the company assets only for legitimate business purposes and shall take measures to prevent the assets of Hikvision from being damaged, illegally occupied or improperly used.

Maintaining confidential and proprietary information is an important corporate policy, and we must comply with all applicable laws and regulations related to privacy and information security to protect our confidential information from damage.

5.2 Respect and Protect Intellectual Property and Trade Secrets

Respecting and protecting intellectual property is not only a requirement of laws and regulations, but also an important principle of the company. Employees shall understand and abide by laws and regulations concerning trade secrets, proprietary information and other intellectual property rights, respect and avoid improper use of others' intellectual property rights. We have the responsibility to protect and avoid the improper

use and disclosure of other people's confidential and proprietary information. Confidential or proprietary information shall not be used for commercial purposes without the express authorization of a third party.

5.3 Avoid Conflicts of Interest

All employees shall perform the duties assigned by the company in good faith and diligently, and must avoid any conflict or possible conflict of interest that may involve individuals and the company. In addition, Hikvision prohibits all employees from using their positions in the company or their relationships with customers or partners for personal interests, or to seek interests for their close relatives.

Conflicts of interest occur when an employee's interests, duties, obligations, or activities, or the interests of close relatives conflict or are incompatible with those of the company.

The situations that may cause conflicts of interest cannot be exhausted. If in doubt, please refer further to the Employee Business Conduct Manual, the Employee Handbook and the company's rules, or contact the Legal and Compliance Department.

5.4 No insider Trading

In the normal course of business, employees may learn about unpublished information about Hikvision or other companies. The use or disclosure of such non-public or inside information for personal interests is not only unethical but also may violate the law. Violations of these laws may result in civil or criminal penalties, and the company prohibits the improper use and disclosure of insider information. If in doubt, please contact the Legal and Compliance Department.

6 Undertake Social Responsibility and Environmental Protection

Hikvision is committed to integrating corporate social responsibility and sustainability into our business, innovating intelligent products and services, and continuously maintaining ecological health and environmental protection. Meanwhile, we are well aware of the company's responsibility for common development and progress with the society, adhering to the belief of "goodness", giving back to the community with practicing "goodness". The company continues to support environmental protection and biodiversity with innovative products and solutions to create a more harmonious and sustainable living environment for human beings.

7 Implementation Guidelines

7.1 Management of the Code

In order to bring the Code into line with the laws of different countries or regions, the company will review the content of the Code every year and reserve the right to amend the Code at any time. The Legal and Compliance Department is responsible for the interpretation and daily maintenance of the Code.

Hikvision makes all reasonable efforts to prevent violations of the Code.

Employees who violate the Code and the accompanying rules of Hikvision may be subject to disciplinary actions, including termination of employment, and may be prosecuted by civil or even criminal laws in accordance with legal provisions.

7.2 Disclose Problems and Report Violations

We welcome any questions on the content of the Code and any reports on possible violations of laws and regulations, the Code or the supporting rules of Hikvision. Suspicious violations can be reported through the following channels:

Internal Audit Department (Email: jubao@hikvision.com; Hotline: 0571- 86611816)

Compliance Department (Email: compliance@hikvision.com)

7.3 Anti-retaliation Policy

We protect any bona fide reporters, and no one shall retaliate against any bona fide reporters who report the behaviors that may violate laws, regulations, the Code or any other systems of Hikvision, and challenge ongoing or proposed business practices or participate in conducting investigations.

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