

Business Code of Conduct and Ethics

TP-Link Group

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Purpose and Scope

With humble beginnings in 1996, TP-Link has grown to what it is today: a global leader of reliable networking devices. The Business Code of Conduct and Ethics (Code) complies with the principles of TP-Link's business conduct worldwide.

This Code applies to all directors, officers, and employees (temporary or permanent) worldwide, regardless of specific TP-Link entity or subsidiary (wholly or partially held) (hereinafter collectively referred to as "TP-Link Employees" or "Employees").

Responsibilities

- **TP-Link Sustainability Committee** is responsible for establishing, reviewing, and updating the Code annually to ensure its compliance with the industry standards.
- **Senior Management** have the ultimate responsibility for the compliance of this Code within their operations.
- **Employees** are obliged to strictly adhere to the principles set out in this Code, all our business must be conducted in accordance with all applicable laws, rules and regulations.
Specifically, all Employees must follow the principles in this Code, become aware of, understand, and follow policies relevant to their job, and feel comfortable asking questions, seeking advice, and raising concerns without fear of retaliation.
- **Suppliers, contractors, and other stakeholders** are encouraged to monitor the enforcement of this Code and report any violation of the Code promptly.

Principles

1. Compliance with Laws and Regulations

TP-Link is committed to assuring that all its business is conducted in compliance with all applicable laws, rules, and regulations. This includes, for example, those relating to antitrust and promoting fair competition, preventing bribery, illicit payments and corruption, insider trading laws and labor laws and practices, preventing forced labor, child labor, human trafficking, and slavery within the supply chain to name a few.

It is the responsibility of every Employee to comply with all the laws and regulations of the countries in which TP-Link does business. Any Employee who fails to obey all applicable laws and regulations may be subject to discipline, up to and including termination.

2. Anti-Corruption and Anti-Bribery

No TP-Link Employee shall offer, give, or receive any payment or item of value to any government official or any other third parties such as customers, suppliers, or other private parties for the purpose of obtaining or retaining a commercial advantage of any kind.

Bribes, kickbacks, or similar payments are never permitted, whether made to a

government official or to customers, suppliers, or other private parties. Similarly, Employees may not solicit or accept such payments.

TP-Link is committed to complying with all applicable anti-bribery and corruption laws. We seek to avoid even the appearance of improper influence. For more details and guidance, please refer to the [TP-Link Anti-Bribery and Corruption Policy](#).

3. Anti-Money Laundering

Money laundering is “any act or attempted act to conceal or disguise the identity of illegally obtained proceeds so that they appear to have originated from legitimate sources”. Money Laundering is illegal and strictly prohibited by TP-Link. Employees should be sensitive to the following examples which may signal potential money laundering and contact TP-Link’s Internal Control or Risk Control Department or Legal & Compliance at compliance@tp-link.com if you suspect any related situation.

- Payments by someone who is not a party to the contract.
- Payments from an unusual, nonbusiness account.
- Use of a shell company.
- Structuring transactions to avoid reporting requirements.
- Transactions forming an unusual pattern such as bulk purchases of products or gift cards or repetitive cash payments.

4. Anti-Fraud

TP-Link continually strives to ensure that all its business conducts are carried out and reported honestly, accurately, and transparently. Fraud and any other forms of dishonesty are strictly prohibited within TP-Link.

Employees have a responsibility for putting these principles into practice and for reporting any breaches they discover.

5. Fair Competition

TP-Link performs its business with honesty, fairness, and integrity and complies with applicable antitrust and competition laws. All Employees should deal fairly with TP-Link’s customers, suppliers, competitors, and anyone else with whom he or she has contact in the course of performing his or her job.

Employees should not agree with a competitor to:

- Set prices or terms of sale for products or services that TP-Link buys or sells.
- Divide markets, territories, or customers.
- Coordinate bid prices or other terms, or whether to participate in certain bids.

For more detail, Employees should consult TP-Link’s [Antitrust Policy](#).

6. Conflicts of Interest

Employees must avoid situations involving actual conflict of interest. Personal or romantic involvement with a competitor, supplier, or subordinate employee of TP-Link,

which impairs an employee's ability to exercise good judgment on behalf of TP-Link, can create an actual conflict of interest. Supervisor-subordinate romantic or personal relationships also can lead to supervisory problems, possible claims of sexual harassment, and morale problems.

An Employee involved in any of the types of relationships or situations described in this policy should immediately and fully disclose the relevant circumstances to his or her immediate supervisor, or any other appropriate supervisor, for a determination about whether an actual conflict exists. If an actual conflict is determined, TP-Link may take whatever corrective action appears appropriate according to the circumstances. Failure to disclose facts shall constitute grounds for disciplinary action.

For more details and guidance, please refer to the [TP-Link Anti-Bribery and Corruption Policy](#).

7. Trade Compliance

TP-Link supports international efforts to prevent trade in technology, substances, and materials that can be misused for warfare or warlike activities, for the manufacture of illicit drugs or for other internationally prohibited activities. TP-Link respects and complies with export control laws in every country where TP-Link does business.

8. Business Partnerships

TP-Link acts with integrity and expects the same commitment from business partners. TP-Link carefully selects our business partners with requirement of comply fully with all legal requirements applicable to the conduct of their business and commit them to high ethical, social, and environmental standards.

9. Anti-Discrimination and Equal Employment Opportunities

TP-Link is committed to complying with all applicable laws providing equal employment opportunities. This commitment applies to all people involved in TP-Link's business. TP-Link prohibits unlawful discrimination against any job applicant, employee, contractors, or unpaid intern by any Employee, including supervisors and coworkers.

TP-Link prohibits pay discrimination between employees of the opposite sex or between employees of another race or ethnicity performing substantially similar work.

10. Human Rights and Dignity

TP-Link is committed to conducting its business in a manner that respects the rights and dignity of all people. TP-Link opposes violations or limitations of human rights and dignity of any kind which includes, but is not limit to, any form of discrimination, slavery and torture, human trafficking, or forced child labor. TP-Link respects the rights of individuals to freedom of association and collective bargaining.

For more details and guidance, please refer to the [TP-Link Human Rights Policy](#).

11. Safety and Health

TP-Link is committed to creating and maintaining a healthy and safe working environment.

TP-Link proactively promotes health and safety awareness for its employees and associates, provides workplaces that meet all applicable standards, ensures that its employees and suppliers are committed to obeying relevant laws and regulations, working instructions and safety measures at all times.

Employees are expected to be familiar with health and safety requirements and actively identify and report areas of improvement, unsafe acts and conditions, and near-miss incidents to ensure that preventative measures are taken to deter any potential harm. For more details and guidance, please refer to the [TP-Link Health and Safety Policy](#).

12. Supplier Diversity, Equality, and Inclusion

TP-Link is committed to fostering diversity, equality, and inclusion within our supplier network. TP-Link actively engages and supports diverse suppliers in our procurement processes, including those owned by minorities, women, veterans, LGBTQ+ individuals, and persons with disabilities. TP-Link strives to create a collaborative ecosystem that embraces diversity and offers equal opportunities for all.

13. Environment

TP-Link is committed to minimizing negative impacts our business has on the environment and operating our plants and facilities in compliance with all applicable environmental regulations.

All Employees are expected to comply with applicable environmental laws.

For more details and guidance, please refer to the [TP-Link Environmental Policy](#).

14. Data Privacy and Protection

TP-Link is committed to only collecting, storing, processing, and transmitting personal data in accordance with applicable data privacy laws and regulations and expects Employees to comply with those laws and company policies. We encourage customers to read the applicable privacy policy and check that policy periodically for updates. TP-Link's United States website privacy policy can be found at <https://privacy.tp-link.com/web/official/privacy-policy>. Supplemental data protection information is available for specific countries and/or regions outside the United States where our partners (including affiliates) operate or provide TP-Link branded web pages or products. For further information regarding our partners' data protection practices in a specific country and/or region, please refer to the privacy policy tailored for that specific country and/or region via <https://www.tp-link.com/choose-your-location/>.

Please report any possible privacy breaches or security risks to Legal & Compliance at compliance@tp-link.com

15. Use and Protection of Business Assets and Confidential Information

The products, services, ideas, concepts, and other information TP-Link produces on a daily basis are important company proprietary business assets. It is the obligation of every Employee to protect TP-Link's property against any improper handling such as carelessness, waste, or destruction as well as against theft or other forms of

unauthorized removal.

Confidentiality should be maintained with regard to sensitive information and commercial secrets, including trade secrets. Employees may not disclose confidential or sensitive information other than for legitimate business purposes and with the appropriate safeguards.

16. Intellectual Property

TP-Link values its intellectual property (IP) rights and respects the IP rights of others. TP-Link employees should support TP-Link's efforts to obtain and protect IP, and should not ignore the IP rights of third parties. If you have any concerns that any TP-Link product may involve the technology, ideas, research and development or IP of others, you must report your concern as soon as possible to the Legal & Compliance Department.

17. Sustainability

As our lives grow ever more connected, TP-Link will continue to pursue excellence and explore the possibilities of tomorrow. This pursuit of excellence includes an emphasis on environmental, social and governance measures to enhance the digital life of communities we serve and deliver a positive impact on the planet.

The areas in which TP-Link strives to practice sustainability include, but not limited to:

- GHG Emissions & Energy Management
- Resource Regeneration and waste management
- Sustainable Supply Chain Management
- Prohibitions of Conflict Minerals
- Data Privacy and Cybersecurity Protection
- Human Rights and Health & safety

All Employees are duty bound to obey all applicable laws, maintain the highest ethical and professional standards, and act with social and environmental responsibility, all in keeping with the fundamental values of openness, loyalty, fair dealing, integrity, mutual respect, and honesty.

For more details and guidance, please refer to the [TP-Link Corporate Social Responsibility Policy](#).

Speaking up

If you witness a Business Code of Conduct and Ethics violation or want to report a potential conflict of interest, you are encouraged to talk to your manager, or contact with compliance department at compliance@tp-link.com.

While TP-Link encourages that you identify yourself when reporting your concerns so that we may follow up with you, as necessary, for additional information, TP-Link also accepts anonymous reports. That said, TP-Link would prefer that you report something anonymously, rather than not at all.

18. Whistleblower Protection

TP-Link handles inquiries and investigations confidentially. TP-Link is fully committed to protecting whistleblowers against retaliation. Whistleblowers' anonymity will be maintained to the extent allowed by law.

- TP-Link will not make, adopt, or enforce any rule, regulation, or policy preventing an employee from being a whistleblower.
- TP-Link will not retaliate against an employee who is a whistleblower.
- TP-Link will not retaliate against an employee for refusing to participate in an activity that would result in a violation of any laws or regulations.
- TP-Link will not retaliate against an employee for having exercised his or her rights as a whistleblower in any former employment.

19. Review and Investigation

TP-Link handles inquiries and investigations confidentially. All reported violations will be subject to a thorough and timely investigation. Failure to comply with any provision of this Code may result in disciplinary action, up to and including dismissal or termination of employment.

TP-Link encourages our suppliers, contractors, and other stakeholders to report misconduct through following channels:

- Your contact point in TP-Link;
- Email box: compliance@tp-link.com.