

Anti-Bribery and Corruption Policy

TP-Link Global

General Provisions

1. Purpose

This Policy is enacted to establish and maintain a robust framework that promotes transparency, integrity, and accountability within TP-Link, and to prevent and combat corruption in all its forms.

2. Scope

This Policy 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"). This policy also applies to those acting on behalf of TP-Link, including contractors, suppliers, and other stakeholders or third parties (hereinafter collectively referred to as "TP-Link Third Parties").

3. Responsibilities

- **TP-Link Sustainability Committee** is responsible for establishing, reviewing, and updating the Policy annually to ensure its compliance with industry standards.
- **Senior Management** have the ultimate responsibility for the compliance of this Policy within their operations. Making sure that all Employees are aware of the Policy and know what their responsibilities are in relation to protecting the human rights of all Employees.
- **Employees** are obliged to strictly adhere to the principles set out in this Policy. Actively engaging in the related training activities to improve their own awareness. Reporting any potential violation of the Policy promptly.
- **TP-Link Third Parties** are encouraged to monitor the enforcement of this Policy and report any violation of the Policy promptly.

4. Definition

Corruption refers to any form of abuse of entrusted power for private gain. Corruption includes but is not limited to bribery.

Bribery refers to the act of offering, promising to give, giving, agreeing to give, requesting, or accepting money, assets, or **anything of a value** to any person or entity, directly or indirectly, with the intention of corruptly or improperly obtaining or retaining a business advantage.

Bribery may be active (offering or promising to give anything of value) or passive (requesting, agreeing to receive or accepting anything of value) in nature if it is committed with the intention of inducing the recipient to act improperly in the performance of his/her duties.

"**Anything of value**" includes, but is not limited to:

- Cash, cash equivalents (such as gift certificates/cards), stock, personal property, and assumption or forgiveness of a debt.
- Gifts, meals, entertainment, and travel—any corporate travel, gifts, entertainment, and meals must be proportionate to the occasion and comply with the gift &

entertainment policy/standards applicable to your location.

- Political contributions.
- Charitable contributions—if made to a charity at the direct request of a government official or private business partner, it could be considered an indirect bribe made in order to obtain or retain business or to secure other improper business advantage.
- Job offers or internship awards—offers to government officials (or their relatives) can present a risk of violating anti-bribery or anticorruption laws and regulations. Compliance must be consulted prior to making such offers.

Core Principles

1. Zero Tolerance for Corruption and Bribery

TP-Link maintains a zero-tolerance policy towards corruption in any form, including bribery, fraud, embezzlement, and other corrupt practices. All TP-Link employees are expected to adhere to the highest ethical standards and conduct themselves with integrity in all business dealings.

- Employees are strictly prohibited from offering, promising, giving or authorizing bribes, directly or indirectly, to anyone, for the purpose of improperly influencing a business decision. TP-Link also prohibits its employees from soliciting, requesting, or accepting a bribe from anyone under any circumstances.
- Employees are prohibited from encouraging suppliers, customers, or any TP-Link Third Parties to engage in activity that is otherwise prohibited by this Policy.
- Employees are expected to promptly report any suspected or known violation of this Policy to a TP-Link lawyer, supervisor, human resources manager or the compliance department at compliance@tp-link.com.

2. Compliance with Laws and Regulations

TP-Link is committed to complying with all applicable anti-corruption laws and regulations in every jurisdiction where we operate.

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

3. Gifts, Entertainment, and Hospitality

Employees are prohibited from offering, giving, or receiving gifts, entertainment, or hospitality that may influence or be perceived to influence business decisions.

All gifts and hospitality received or provided must be within reasonable and customary business practices and must be properly documented.

The giving and accepting of gifts, entertainment, and hospitality is allowed if the following requirements are met:

- It is not made with the intention of influencing a third party to obtain or retain

business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits.

- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It is appropriate in the circumstances, taking account of the reason for the gift, its timing and value.
- It is given openly, not secretly; and
- It complies with any applicable local law.

We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

4. Conflicts of Interest

Employees must avoid situations where their personal interests conflict with the interests of the organization, ensure all actions are transparent and well-documented, ask your supervisor about removing yourself from the situation in which you have competing loyalties.

Should any potential or known conflicts of interest happen, employees are required to promptly report to their supervisor, human resources manager or the compliance department at compliance@tp-link.com.

Examples of conflicts of interest include but not limited to:

- **Insider trading.** Employees use confidential or non-public information to make investment decisions that give him/her or a related individual an unfair advantage.
- **Nepotism.** Employees in a position of authority favor and employ a close relative or close friend based on the relationship rather than actual qualifications.
- **External employment.** Employees are hired by TP-Link's competitors or having relationships with TP-Link's competitors which includes, but not limited to, being a competitor's customer, distributor, supplier, acting as a director or engaging in activities in a consultant, volunteer or other similar capacity that are or can reasonably be expected to further the interests of a competitor.

5. Third Party Management

TP-Link expects all suppliers, customers, and Third Parties to apply the highest ethical standards in their business relationships and to comply with TP-Link Supplier Code of Conduct, their own codes of conduct, and this Policy.

- Suppliers, customers, and all other TP-Link Third Parties shall not bribe any TP-Link Employees or his/her close relatives in any forms in connection with TP-Link's business.
- TP-Link encourages suppliers, customers, and all other TP-Link Third Parties to report any suspected or known violation of this Policy to compliance@tp-link.com.
- Supplier, customers, and all other TP-Link Third Parties shall be obliged to

cooperate with TP-Link's anti-corruption audits if necessary.

6. Records and Internal Controls

Employees are required to make and keep records that fairly and accurately represent how you spend money, no matter how large or small the transaction. Employees must comply with TP-Link's expense reimbursement rules to obtain reimbursement of your expenses related to business, including gifts, entertainment, and hospitality to third parties. Any mischaracterization or omission of any transaction on books or any failure to maintain proper accounting controls that results in such a characterization or omission is not permitted.

Core principles as follows:

- Business records must accurately reflect the truth of the underlying transaction or event.
- Employees must not mischaracterize payments made to any third party.
- Employees may sign only documents that employees are authorized to.
- Employees must not enter into any side letters or side agreements.
- Employees must not use or provide marketing or business development funds to directly or indirectly provide items of value that would violate the Business Code of Conduct and Ethics or this Policy.

7. Reporting

If you have any questions about this Policy, or witness an Anti-Bribery and Corruption Policy violation, 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.

8. 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.

9. Training and awareness

TP-Link organizes regular training programs on anti-corruption policies and procedures

to ensure that employees learn, understand, and follow relevant principles and rules.