Proya Cosmetics Co., Ltd.

Business Conduct Management Policy

1. Introduction

To regulate the business operations of Proya Cosmetics Co., Ltd. (hereinafter referred to as the "Company"), prevent unfair competition risks, maintain the order of fair market competition, protect the Company's lawful rights and interests, and establish an operating image of integrity and compliance, this Policy is formulated in accordance with the *Anti-Unfair Competition Law of the People's Republic of China* and other relevant laws and regulations, as well as the *Articles of Association* of the Company, and in light of the Company's actual circumstances.

2. Scope of Application

This Policy applies to the Company and its subsidiaries and branches included in the scope of its consolidated financial statements, covering all employees and all customers, suppliers, service providers, contractors, and other entities that have business dealings with the Company.

This Policy covers the full process of the Company's operation and management, including but not limited to all business activities such as marketing, customer cooperation, procurement and bidding, advertising and publicity, data use, and platform operations.

3. Responsibilities

Board of Directors: As the leadership body for the Company's business conduct management, it is responsible for guiding all departments to further improve internal control systems, hearing reports from all departments on business conduct management, and other matters.

Strategy and Sustainable Development Committee of the Board of Directors: As the supervisory and management department for the Company's business conduct, it is responsible for organizing the formulation and improvement of management measures or detailed rules for the Company's governance of commercial bribery, convening work meetings on business conduct governance, and other matters.

4. Management Measures

(1) Prohibited Acts

Unfair competition refers to acts by business operators that disrupt the order of market competition and harm the lawful rights and interests of other business operators or consumers in production and business activities. The Company prohibits the following acts in its business activities:

1) Engaging in acts of confusion, including unauthorized use of product marks, entity names,

online identifiers, or other identifiers that have a certain degree of influence and belong to others, as well as other acts sufficient to mislead others into believing that the products are those of another party or have a specific connection with another party;

2) Making false or misleading commercial publicity on product performance, quality, sales status, user evaluations, and other matters;

3) Obtaining, disclosing, using, or allowing others to use trade secrets by improper means such as theft, bribery, fraud, coercion, or electronic intrusion, or infringing upon others' trade secrets in violation of confidentiality obligations.

(2) Compliance Training and Culture Building

The Company establishes a regular compliance training mechanism. The management shall attend compliance training every year, focusing on typical cases and relevant laws and regulations concerning commercial bribery, false publicity, trade secret protection, and other matters. Employees in high-risk positions such as marketing, procurement, market, and R&D shall receive special training every quarter. At the same time, the Company continues to cultivate a corporate culture of fair competition and integrity in business through internal publicity, preparation of internal rule-of-law publications, warnings on typical cases, compliance-themed activities, and other means, so that compliance awareness becomes deeply rooted.

(3) Risk Prevention and Control and Review

The Company implements prior compliance reviews of high-risk links, such as advertising and publicity, formulation of sales policies, and customer transactions. All external publicity materials shall be reviewed by the Legal Department before release to ensure that they contain no false or misleading content that disparages competitors. Sales policies shall not contain clauses on monopoly agreements such as price fixing and market division, and sensitive information exchanges with competitors shall be avoided. In customer transactions, commercial bribery risks shall be strictly prevented, and obtaining transaction opportunities through kickbacks, improper complimentary gifts, and other means shall be prohibited. When signing contracts with suppliers, distributors, and other business partners, the Company shall clearly agree on anti-unfair competition clauses. If the Company is penalized or suffers losses due to a partner's violation, the Company has the right to seek compensation in accordance with the contract.

5. Others

This Policy is formulated by the Strategy and Sustainable Development Committee of the Company's Board of Directors, which shall be responsible for its interpretation.

Matters not covered by this Policy shall be handled in accordance with relevant laws, regulations, rules, and normative documents.

This Policy shall take effect on the date it is reviewed and approved by the Company's Board of Directors. The applicability of this Policy shall be assessed every three years or when major changes occur.

Proya Cosmetics Co., Ltd.

August 2026