

Code of Conduct for Suppliers and Contractors

Purpose of the Code

Best Mart 360 Holdings Limited and its subsidiaries (hereinafter collectively referred to as the "Group"), with its objectives of "Best Quality" and "Best Price", upholds the philosophy of global procurement, striving to provide customers with more diversified choices and more comfortable shopping experience.

Our Group has always valued integrity. We strive to act with fairness and probity when seeking competitive products and services. In striving to promote a sustainable business strategy, we adhere to business ethnics and comply with all applicable regulations in the areas where we operate.

The Group is committed to assessing the performance of suppliers and contractors by adopting responsible and consistent evaluation standards. Our objective is to establish a fair, open, transparent, and mutually beneficial cooperation relationship with business partners.

The Group expects that contractors and suppliers will appreciate our value and adhere to the standards outlined in the following "Supplier and Contractor Code of Conduct" in order to jointly create a sustainable and socially responsible future.

This code and any updates, amendments or supplements thereto are available on the Best Mart 360° Group website.

Scope of the Guidelines

1. Compliance with Regulations

Suppliers and contractors shall comply with all applicable laws, conduct and ethical standards, including but not limited to labour laws, health and food safety laws, import and export regulations of goods and materials, intellectual property, trademarks, copyrights, design patents, in the areas where they operate.

2. Business Integrity and Ethics

Suppliers and contractors shall uphold the principles of honesty, fairness, and ethics in conducting their business. The Group encourages suppliers and contractors to develop and adhere to anti-bribery and corruption policies.

The Group does not allow any form of bribery, corruption, fraud, anticompetitive practices and money laundering.

3. Conflicts of Interest

Suppliers and contractors shall avoid any situation that may lead to actual, perceived, or potential conflicts of interest.

Conflict of interest refers to the potential private interest contradictions or conflicts that may arise in business operations between suppliers or contractors and the decision-makers of the Group. Private interests not only include monetary interests but also encompass the relationships or connections between the Group's decision-makers of the related projects and suppliers or contractors, which may influence the judgement of the Group's decision-makers when executing business decisions.

Suppliers and contractors shall disclose any potential material conflicts of interest to the Group. The Group will assess and address relevant risks based on the actual and specific circumstances.

4. Gift and Entertainment Policy

The Group values staff conduct and is committed to building an excellent management team with honesty, integrity and objective. The Group has established a policy prohibiting the acceptance of gifts and entertainment offerings that suppliers and contractors must comply with. Suppliers and contractors must not violate this policy by offering gifts and entertainment offerings to the staff of the Group. Gifts include cash, cash coupons, red packets, shopping vouchers, gift baskets, various entertainment and hospitality, including but not limited to travel, sports events, concert invitations, etc.

5. Labour Protection

Suppliers and contractors shall comply with the national labour regulations of the countries where they operate and shall not employ child labour or illegal workers. Meanwhile, they shall also commit to paying wages to staff regularly and on time.

Staff or job seekers shall not be discriminated against on the basis of gender, age, race, family status, religion, or political opinion. The Group expects our business partners to share the same philosophy as the Group in providing a dignified, fair, healthy and safe working environment for staff.

6. Environmental Responsibilities

The Group is pleased to see suppliers and contractors committed to protecting the environment by minimising the release of chemicals and hazardous substances during the provision of products or services, so as to jointly create a healthy and better society.

7. Data Confidentiality

Without the written consent of the Group, suppliers or contractors are prohibited from disclosing the sensitive or confidential business information of the Group to third parties. Meanwhile, suppliers and contractors shall protect the privacy of the Group and its staff. They shall strictly comply with the regulations in the Hong Kong Privacy Ordinance regarding the collection, processing, storage or use of personal data.

8. Reporting Violations

Report any violation or suspected violation of this code of conduct to the Group. Please make the report of any misconduct of violation to the email auditcom@bestmart360.com, or by written to our Audit Committee at 11th Floor, C-Bons International Center, No. 108 Wai Yip Street, Kowloon, Hong Kong.

9. Audit and Investigation

The Group reserves the right of assessments to evaluate our contractors or suppliers' adherence to this code of conduct on a regular or irregular basis.

Conclusion

The Group strictly complies with all applicable regulations in the areas where we operate. We hope to have an understanding from suppliers and contractors and expect their compliance with this code, as well as considering it as the attached terms to the terms of contracts executed by both parties.

The Group firmly believes that business cooperation relationship based on transparency, fairness, honesty, integrity and social responsibility will definitely create growth opportunities with sustainable development, mutual benefits and sharing.