

## **BUSINESS ETHICS**

Brightstar Asia Ltd. is dedicated to conducting business in an ethical manner, upholding our core values of honesty, fairness, respect, and integrity. This policy outlines the expectations and requirements for all employees, officers, and directors of Brightstar to ensure compliance with applicable laws and ethical business practices.

### **Applicability**

This Business Ethics Policy applies to all employees, officers, and directors of Brightstar. Every employee is required to review, understand, certify, and adhere to this policy. Non-English speaking employees will receive an induction workshop to ensure a comprehensive understanding of the policy.

### **Questions or Concerns**

If you encounter an ethical concern or are unsure about the appropriateness of a course of action, ask yourself the following questions:

- Is this the right thing to do?
- Am I being truthful and honest?
- Does it comply with Brightstar's policies?
- Would I feel comfortable if my proposed activities were reported in the news?
- If the answer to any of these questions is no, promptly discuss the matter with your supervisor or the Compliance Officer. If you become aware of a possible violation by others, report it immediately to your supervisor or the Compliance Officer.

### **Compliance Officer**

The Compliance Officer for Brightstar is the Managing Director. Any changes to the Compliance Officer will be communicated to all employees.

### **Protecting Confidential Information**

All information related to Brightstar's business, customers, and suppliers should be considered confidential, unless publicly released. Employees must take steps to protect this confidential information, even after their employment ends. Safeguarding confidential information is crucial, and employees should label documents appropriately, obtain signed non-disclosure agreements, avoid discussing confidential information inappropriately, and secure electronic files and physical assets.

### **Safeguarding Assets**

Brightstar's assets, including facilities, equipment, and technology resources, should be used for business purposes only. Employees are responsible for protecting these assets from theft, loss, damage, or misuse to the best of their ability.

### **Avoidance/Disclosure of Conflicts of Interest**

Employees must always act in the best interests of Brightstar and avoid any relationships that create conflicts of interest with their duties and responsibilities. Any situations involving conflicts of interest should be disclosed to the appropriate channels within Brightstar.

### **Giving or Receiving Gifts**

Business entertainment and gifts should be intended to foster good working relationships, not gain unfair advantages. Such activities must comply with customary business practices, be within acceptable value limits, and not violate any laws. Brightstar prohibits gifts to government officials without express permission.

### **Books and Records**

The integrity of Brightstar's financial results depends on accurate and complete records. Employees must ensure that all information recorded in Brightstar's books and records complies with policies, relevant laws, accounting standards, and ethical practices.

### **Compliance with Laws and Regulations**

Brightstar is subject to various laws and regulations. Employees must comply with applicable laws, regulations, and corporate policies, including those related to anti-bribery, political contributions, export, customs, antitrust, and privacy.