OPPO

Corporate Compliance Red Line 1.0

Issue Date：May 13, 2021

I. Purpose

Corporate Compliance Red Line has been set to guide OPPO and its direct or indirect subsidiaries and branches (collectively, the "Company") as well as all employees to understand and comply with laws and regulations, to prevent and control compliance risks, to promote compliance operations and to escort healthier and longer- term growth of the Company.

II. Scope of Application

Corporate Compliance Red Line applies to the Company and all its employees. The Company, the members of the Company's Board of Directors and all employees shall observe the Compliance Red Line. The subsidiaries and branches of the Company operating in different countries or regions around the world may adapt the Compliance Red Line in accordance with local laws. In the event of any conflict between the Compliance Red Line and the local mandatory laws, the local mandatory laws shall prevail. Appropriate adaptations and conflicts should be reported to the Legal & Compliance Center as soon as possible.

III. Applicable Principles

Corporate Compliance Red Line is the bottom line that employees must adhere to in external cooperation and communication:

1. Any employee is prohibited from carrying out business in violation of or circumventing the Compliance Red Line;
2. Any business activities involving the Compliance Red Line are prohibited from approval or decision-making;
3. Any employee shall have the right and responsibility to report violations;
4. Any reported or found violations and violations of the employees will be investigated and held accountable.

IV. Universal Compliance Red Line

1. Offering of property (cash or cash equivalents) or any other means to bribe any person of the public sector or private enterprise, in order to seek a business opportunity or competitive advantage is prohibited.

IV. Universal Compliance Red Line (ctd.)

2. Obtaining technical, operational, financial and other confidential information from competitors or partners by improper means such as theft, eavesdropping, fraud or bribery is prohibited; carrying, storing or using confidential information of former employers is prohibited; and over-authorized sharing of confidential information obtained from partners is prohibited.
3. Reaching agreements or concerted actions with competitors on pricing strategies of commodities, production or sales volumes of commodities, segmentation of sales/raw material procurement markets, restrictions on purchase/development of new technology/new equipment, boycott of transactions, etc., through industry associations, industry alliances or other means is prohibited.
4. The sale, export, re-export, transfer or other transfer of Company's hardware, software and technology for the design, development, production, use or storage of nuclear, biological, chemical weapons, missiles or other military items is prohibited, nor shall Company's hardware, software or technology be used in any activities or facilities related to such weapons.

IV. Universal Compliance Red Line (ctd.)

5. OPPO “Ten Don’ts” for Data and Privacy Protection shall be strictly adhered to in the Company's business activities such as research and development, production and marketing.
6. It is prohibited to forge seals or signatures or sign false contracts, or evade laws and regulations by fabricating or concealing facts, forging materials or engage in other fraudulent practices.
7. It is prohibited to engage in any business activities explicitly prohibited by mandatory laws.

V. Compliance Red Lines in Production and Procurement Activities

1. It is prohibited to produce or purchase products/raw materials that fail to meet the national standards or quality requirements.
2. It is prohibited to discharge, dump or dispose of radioactive wastes, wastes containing pathogens of infectious diseases, toxic or other hazardous substances.

VI. Compliance Red Lines in Sales and Marketing Activities

1. The direct or indirect sale, export, re-export, transfer or other means of divulgence of Company's hardware, software and technology to embargoed countries or regions are prohibited. 1
2. It is prohibited to sell counterfeit or substandard products, licensed goods without franchise license or products that fail to meet national standards, trade standards or quality requirements.
3. It is prohibited to adopt improper means of marketing such as deliberate and intentional confusion, promotion of false narratives, and defamation campaigns against competitors.

VII. Compliance Red Lines in R&D Activities

1. It is prohibited to implant any malicious code, malicious software, backdoor, manufacture or spread virus in the development, delivery or service of the product. It is prohibited to attack, damage or use the communication network of the Operator or the enterprise IT network to engage in any activities that endanger national security, public interests or the lawful rights and interests of others.

VIII. Reporting of Violations and Accountability

I. Reporting of Violations

It is the responsibility and obligation of every employee to understand and comply with the Compliance Red Lines. Any employee who becomes aware of violation of the Compliance Red Lines has the right and responsibility to stop the violation immediately and report the violation to your supervisor or the Legal & Compliance Center.

You may contact the Legal & Compliance Center by sending an email to compliance@oppo.com or log in to the Legal Compliance Portal Https://lcp.myoas.com/ contact your interface legal or for compliance incident escalation.

VIII. Reporting of Violations and Accountability (ctd.)

II. Investigation and Accountability

Legal & Compliance Center and other relevant departments shall have the right to investigate violations. Each department and all employees of the Company shall cooperate with the investigation and, based on the investigation, immediately stop the violation and make rectification. At the same time, the Company will hold the violator accountable in accordance with the relevant accountability system depending on the nature of the violation.

IX. Version Maintenance and Updates

Corporate Compliance Red Line are interpreted and maintained by the Compliance Management Department of the Legal & Compliance Center.

Corporate Compliance Red Line is effective on the date of issue.