



Code Of Conduct

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Greenland Technologies Holding Corp

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Leadership Message

“Since our formation in 2006, Greenland Technologies Holding Corp and our subsidiaries (“GREENLAND”) have strived to pursue innovation and excellence through the development and manufacture of high-quality and innovative products and services. We have succeeded in creating state-of-the-art solutions, long lasting relationships with our suppliers and clients and responsible contributions to our local communities. This has been achieved through our culture and commitment to operate with excellence, respect and integrity in every task we do.

Our culture fosters an environment that is physically and emotionally safe for employees, business partners and clients alike. By holding ourselves to the highest standard and treating everyone with fairness and respect we are able to lead our business to future opportunities. This responsibility to understand and follow the Greenland Code of Conduct is shared by everyone within the company to embrace and uphold our values as we conduct business. Together we can continue to build our reputation and share with our suppliers, partners and clients what we stand for and how we conduct business. Thank you to each and everyone that carries our culture to build a better tomorrow.”

A handwritten signature in black ink, appearing to read "Ray Wang". The signature is stylized with a large, looping initial "R" and "W".

Raymond Z. Wang
CEO

Overview

The *Greenland Code of Conduct* is a brief guide on the expected conduct of individuals working at *Greenland* (including its subsidiaries and affiliates). The content within this guide is a summary of basic Company Policies and legal requirements that affect our business. It will help you recognize when possible legal or ethical issues exist, how to elevate them and where to look for additional information.

However, governing law, labor contracts, and the application of specific company policies can vary around the world. If local law or labor contracts conflict with a Company Policy, then the local law and labor contracts take priority over the Company Policy. Otherwise, local policies and practices must conform to the Company's global Policies. If you are unsure of the policy to follow, please discuss with your management or Human Resources representative.

Who Must Follow Our Code?

This content of the *Greenland Code of Conduct* summarizes our major Corporate Policies and Directives of the Company that apply generally to our global operations and business. The *Code* applies broadly to all full-time, part-time, supplemental and temporary employees, as well as any agency personnel and independent contractors while they are performing services for the Company. A few sections apply only to Company employees. In those instances, the term "employees" is used.

What If I Have a Code-Related Question or Concern?

Any questions or concerns about the *Code* can be directed to your management or your Human Resources representative.

Duty To Report Violations

All personnel must report all known or suspected violations of the Company Policy or business-related legal requirements, including:

- Civil and criminal laws, and government rules and regulations
- This *Greenland Code of Conduct Handbook*

If you become aware of a known or suspected violation of Company Policy or business-related legal requirements, then you should report it promptly to one of the following:

- Your management
- Your Human Resources representative
- Your local legal office

- Your Local Incident Coordinator*

***NOTE:** If you are an organization or independent contractor providing services to Greenland and receive a report of a suspected violation, then you should immediately forward the report to your Local Incident Coordinator identified in your contract.

Reporting Protection

Company Policy prohibits any form of retaliation against individuals who, in good faith, report suspected violations of the law or Company Policy, or who cooperate in an investigation of a suspected violation reported by someone else.

When you report suspected violations, it is most helpful if you provide your name so you can be reached for further details and follow-up information. All reports are handled as confidentially as possible, while still enabling the Company to conduct a thorough investigation. However, you may file an incident report anonymously.

Operate Lawfully

1. Compliance With The Law

Greenland fully supports a competitive marketplace and prohibits any illegal or anticompetitive activity. We grow our business through our exceptional quality, innovative offerings and significant value. We do not win business through illegal actions and we:

- Respect competitive laws when working with suppliers, dealers, and customers while recognizing that we may be restricted in our ability to influence resale prices, policies, and practices
- Will never limit access to repair information, tools, or third-party parts
- Follow the appropriate rules and processes for working together and sharing information during any potential or actual business partnership or agreement
- Will not make any anticompetitive agreements with competitors including the discuss of any commercially sensitive topics

Anyone who violates the law will be subject to disciplinary action, up to and including termination or release. Violations of the law can expose the Company, and even the individual violator, to fines, penalties, civil damages, and, in some cases, imprisonment. Additionally, violations could damage the Company's reputation and resulting business performance.

2. Trade Controls

As a global company, we take seriously our responsibility to comply with all applicable export laws, sanctions and other restrictions. Violating these restrictions can lead to significant penalties such as loss of import/export privileges that would make it difficult or impossible for Greenland to operate. As such, we:

- Understand to the best of our ability all applicable trade laws, sanctions and other policies and restrictions and respect that commercial activity with certain countries, territories, entities, sectors and persons are prohibited
- Maintain accurate and complete records related to trade compliance activities
- Conduct appropriate due diligence to comply with trade sanctions, export controls and other anti-boycott requirements
- Monitor boycott requests to prevent from engaging in any unlawful boycotts
- Remain diligent to identify any suspicious trade activities and report them to the appropriate enforcement authorities

If you are involved with the sending or receiving of any Greenland products, services, equipment, software or any form of technical data from one country to another, then work with your manager to ensure your activity is lawful and any appropriate control processes are followed.

Commitments

1. Commitment To Our Clients

a. Quality Of Our Products

At Greenland we pride ourselves in the quality of our products and services while continually innovating and improving to better serve our clients. We utilize disciplined processes to measure and ensure performance and consistency that meet or exceed any regulatory requirements. It is our duty to:

- Educate our employees, suppliers and partners to maintain and seek improvement to the quality of our performance
- Inform our clients on new and innovative ways to exceed their expectations
- Take personal responsibility to meet and exceed our quality and performance standards
- Promote safe and responsible consumer practices

- Prioritize any quality concerns, whether from inside or outside the company, and address them appropriately

b. Communication

Our clients value Greenland not only by our quality products and services, but by the way we hold ourselves to a higher standard in how we treat clients and operate our business. The following principles help us to maintain that high standard:

- Our client's trust directly relates to our brand reputation and is a critical asset as a result. We must all ensure to continually earn that trust in all communications and interactions with our clients and prospects.
- We take pride in the communication with our clients, whether they be questions, concerns or compliments by encouraging open dialogue.
- Understand the importance of client feedback as opportunities to earn trust while identifying improved ways we can do business.
- Ensuring that we protect the privacy and security of any personal information collected. Our security procedures strictly limit access to and use of our client's personal information and we must all take measures to protect client data from unauthorized access.

How we present ourselves publicly is critical to the brand and reputation of Greenland and we must be careful with how we portray ourselves to ensure any communication reflects our values. Only certain persons are authorized to speak on Greenland's behalf when engaging with Media, Government representatives, lawyers, and investors.

- Direct any inquiries from outside Greenland to the proper company resources and do not attempt to answer them on your own
- Do not make public statements or commitments on Greenland's behalf, or use Greenland's name, logo, or other company assets in public communications unless authorized to do so
- Follow Greenland's social media use policy
- Do not share financial or material information about the business outside the company unless you have the approval to do so
- Do not make public references to competitors unless Investor Relations has given you pre-approval to do so

2. Commitment To A Safe And Healthy Work Environment

Employee safety is important at Greenland and requires the contribution of everyone. Follow workplace health and safety guidelines to ensure both your personal safety and the safety of others. We meet and exceed applicable laws and safety regulations to protect the safety of our workforce in all our locations. Our workforce understands:

- Participation in all required safety training courses
- Understand and follow Greenland's safety policies, processes and requirements
- Utilize all required personal protective equipment
- Only operate equipment and vehicles that you are trained and authorized to use
- Never work or operate while impaired by illegal drugs, controlled substances or alcohol
- Report any unsafe behavior or hazardous conditions immediately to your management

Respect In The Workplace

We are committed to making all associates and partners of Greenland comfortable in the workplace. We recognize that diversity in our workforce is a valuable asset and strive to provide an inclusive work environment in which different ideas, perspectives, and beliefs are respected. All associates are expected to treat their coworkers and those they work together with respect at all times. Violations of Greenland's equal opportunity policies may result in discipline, up to and including termination or release.

1. Equal Opportunity

At Greenland, we recruit talent based solely upon their individual merit and qualifications directly related to their professional competence. We prohibit any unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, gender, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled. This value also applies to those who do, or seek to do, business with us.

2. Anti-Harassment

We prohibit any discrimination, harassment or bullying in any form - verbal, written or physical. If you believe you've been a victim of or witnessed one of these events, then we strongly encourage you to report the incident to your management immediately.

Human Resources and management will promptly and thoroughly investigate any complaints and take appropriate action. Anyone who violates Greenland's Anti-Harassment Policy will be subject to disciplinary action, up to and including termination or release. Applicable incidents will be escalated to the local authorities.

3. Privacy Practices

We will collect and store personal information from employees around the world. However, we follow all local laws and Greenland internal policies that limit access to this employee data to protect the privacy of our employees.

4. Personal Relationships at Work

Certain relationships within Greenland can or be perceived to compromise your ability to perform your job responsibilities, may create uncomfortable or conflicted positions, and may raise issues regarding fairness, favoritism, or harassment. As a result, any romantic or physical relationships are not permitted between Greenland associates where one individual has the ability to exercise authority or supervision over the other.

Integrity

Our company's reputation relies on the trust given to us by our clients, prospects and partners. We earn this trust by always acting with integrity and ensuring that every business task is handled ethically, honestly and lawfully.

1. Conflict of Interest

All Greenland associates must avoid situations that present a conflict of interest or reasonably present the appearance of a conflict. This includes events where competing motivations could lead you towards a situation that creates personal benefit for yourself, your friends, your colleagues or your family at the expense of Greenland or our clients. If you believe a task could present a conflict of interest, then you must inform your management immediately.

2. Anti-Bribery Laws

Greenland relies on our exceptional products and services to win business and will never use bribery to win business or accept bribes to buy our business. All Greenland associates must:

- Avoid any behavior that could be viewed as a bribe.
- Understand the rules when working with other businesses including our policies surrounding gifts, meals and entertainment.

- Ensure that our business partners and contractors understand our commitment to avoid bribery in our business and expect them to do the same
- Accurately document business expenditures including meals and entertainment
- Give ethically by only providing gifts, meals, and entertainment that are appropriate and consistent with Greenland's guidelines.

3. Outside Employment

Employees are prohibited from engaging in any form of outside employment with a client, business partner or competitor of Greenland while holding employment with the Company. This situation creates a conflict of interest that can harm the company. Employment with organizations outside of Greenland's network is acceptable, but must be approved first by management to ensure no conflict of interest exists.

4. Personal Investments

Greenland personnel are prohibited from making personal investments in organizations that are competitors or business partners of the Company if their role grants them material inside information that could influence the performance of the investment or harm Greenland. Investments in vehicles such as mutual funds that hold a broad portfolio of companies that include Greenland competitors or business partners generally do not create conflicts of interest.

5. Drugs and Alcohol

Operating in the work environment while under the influence of drugs, controlled substances and/or alcohol puts the health and safety of yourself, your coworkers and our clients in danger and is strictly prohibited. Possession or usage of any illegal drugs on any Greenland premise or sponsored event may lead to termination or release. Alcohol may be consumed, but only in moderation that does not impair the ability, performance or behavior of the employee. Management is permitted to request an alcohol or drug screening on any employee they have reasonable suspicion of being under the influence based on the employee's appearance, behavior or speech.

Company Assets

1. Company Equipment

For the safety of yourself and others, employees must complete all required training and follow all operating protocols when using Greenland equipment. Heavy equipment can

only be used with the appropriate approval by management and by associates with the required licenses. Company funds, equipment, facilities and other physical assets are not for personal use. Violations may lead to disciplinary actions including termination or release.

Any actions performed on Greenland corporate electronic assets such as computers and network may be stored and disclosed to peoples inside and outside the company. This monitoring is required for the safety of Greenland and may be required to comply with local laws and regulations.

2. Intellectual Property

We at Greenland are proud of our innovative research and development that has resulted in a cache of intellectual property rights that allow us to provide exceptional products and services to our clients. All Greenland associates must respect all forms of the Company's intellectual property. Ask your management or the Marketing Team for approval before using or sharing any Greenland intellectual property for business or commercial projects. Intellectual property includes copyrights, trademarks, patents, trade secrets and confidential and proprietary information. Notify your management immediately should you witness any unauthorized or counterfeit use of our intellectual property.