



## Code of Business Conduct

Modern Group employees are to exhibit the highest standards of competency, honesty, integrity, and fairness. Furthermore, we accept a personal responsibility to adhere to professional business ethics, the applicable laws of China, and international law.

Modern Group managers pledge to protect the environment and safeguard our workforce while we exhibit honorable actions and behavior. The principles of Modern Group govern our conduct in serving the interests of our workforce, clients, and the public.

Modern Group Professionals:

1. Offer services in steel structure fabrication and modular construction and are competent and experienced, affording full disclosure of their qualifications.
2. Consider the consequences of their work and seek continuous process improvement, better project management, and enhancing the customer experience and factory-customer relationship.
3. Are honest, truthful, ethical, and fair in presenting information and making public statements reflecting on colleagues' professional matters and their roles, whether verbal or through printed or electronic media.
4. Respect human rights and engage in professional relationships without bias or prejudice based on race, religion, gender, age, ethnicity, national origin, sexual orientation, marital status, socioeconomic status, political affiliation, or disability.
5. Act as professionals while serving all clients and projects as faithful agents and trustees by not disclosing, without consent, or taking improper advantage of, anything of a proprietary or confidential nature concerning the business affairs or technical processes of any present or former client or employer.
6. Will disclose known or potential conflicts of interest to affected parties or other circumstances that might influence or appear to influence the fair execution of marketing, business development, contract administration, manufacturing, or project management.
7. Are responsible for enhancing their professional competence throughout their careers and promoting others to advance their learning and competence.
8. Embrace training and development through a planned process, increasing the company's core competency.
9. Accept responsibility for their actions and seek and acknowledge evaluation of their work.





**Modern Group**  
**Heavy Industry Steel Fabrication & Modular Construction**

**Modern Heavy Industries (Taicang) Co., Ltd.**  
**Modern Modular Engineering & Construction (Suzhou) Co., Ltd.**

10. Offer honest and constructive criticism of colleagues' work and properly credit coworkers' contributions while not accepting credit for work that others have done.
11. When observing a risk to the health and safety of company workers or clients, Modern Group employees shall formally advise their employers, clients, and subordinates and, if warranted, immediately restore a safe environment, or remove the safety risk.
12. Seek to improve manufacturing and adopt better technical measures to reduce or remove potential adverse impacts on air, water, and the general environment, use less power and fuel and maintain a clean and tidy workplace.
13. Act under all applicable laws and ethics as relevant to the Design, Manufacture of Steel Structures & Modularized Production Facilities and Related Management Activities as stated in the laws and regulations governing this industry in China; and according to ISO 9001, 14001, 45001, and other nationally recognized certifications.
14. Do not offer or accept bribes or facilitate payments, either directly or indirectly, in compliance with anti-bribery laws and in maintaining high professional and ethical standards.
15. Will not engage in insider trading or conduct business that would conflict with, seek advantages, or otherwise compromise the company's or client's interests.
16. Must maintain moral, ethical, and legal protocol concerning receiving favors, money, gifts, or entertainment.
17. Must avoid engaging any person or business involved in illegal or illicit activities and avoid funding such entities or individuals known to or suspected to be operating illegally.
18. Report all company accounting, financial transactions, and financial information timely and accurate.
19. Must immediately report to executive management or compliance officer any breach or violation of the Code of Business Conduct or other injurious behavior without compromising the employment or status of the person making the report.
20. Undertake that significant violation of the Code of Business Conduct may result in management taking actions that may include a verbal warning, a written warning, probation, or termination of employment.

