

Anti-Corruption Policy

Section I General Provisions

- 1 The establishment and purpose of this *Anti-Corruption Policy* (the "**Policy**") is to prevent employees of the Group engaging in corruption during the course of conducting business as well as strengthening and ensuring the Group's commitment to conduct business with the highest standards of honesty and integrity worldwide, and finally to ensure that the conduct of the Group's employees follows the relevant requirements of applicable anti-corruption laws. This Policy is based on the *Foreign Corrupt Practices Act* of the United States, the *Bribery Act 2010* of the United Kingdom, *Criminal Law of the People's Republic of China*, the *Anti-Unfair Competition Law of the People's Republic of China*, and other relevant laws.
- 2 This Policy applies to UP Fintech Holding Limited and all its affiliated entities within the scope of its consolidated financial statements (the "**Group**" or "**Tiger Group**").

The subsidiaries of the Group that hold financial licenses or qualifications may, subject to this Policy, establish more stringent anti-corruption policies in accordance with the local regulatory laws and operational practices in their respective jurisdictions. The Chief Compliance Officer of the Group shall have the authority to require any subsidiary of the Group to comply with the specific anti-corruption policy of any of its respective licensed entities.

Section II General Principles

- 3 The Group is committed to maintaining the highest ethical standards in business conduct. The Group does not tolerate any corruption involving government officials and commercial organizations and the Group does not engage in facilitating or receiving unethical incentives or payments.
- 4 The Group, its employees or agents shall not, directly or indirectly (through third party intermediaries or otherwise) provide anything of value to any government official or agent or employee of any third party commercial organization by offering, promising, approving, participating in, or influencing his/her action (or ensuring inaction) and/or obtaining any improper business

interest or benefit.

- 5 The Group, its employees or agents shall not, directly, or indirectly (through third party intermediaries or otherwise) agree to take, or request, demand, or otherwise receive anything of value to influence the action (or ensure inaction) of the aforementioned parties and/or provide any improper business interest or benefit to any other party.
- 6 For the purpose of this Policy, anything of value refers to any money/cash, securities, entertainment items, payment or reimbursement of travel expenses, charitable or social contributions, discounts on products or services, employment or internship opportunities to relatives and stakeholders, commitments of repayment or forgiveness of debts, or other valuable items or benefits.
- 7 The Group, its employees and agents shall not act as intermediaries of public or private bribery, that is, delivering bribes at the direction of the bribe giver or the bribe recipient, or otherwise assisting in the completion or implementation of a contract between a bribe giver and bribe recipient.

Section III Specific Requirements

8 Contract Requirement

When a non-licensed entity of the Group enters into a contract with a third party, to the extent actual circumstances permit, it shall apply the contract templates formulated by the Group containing anti-corruption undertakings (in which the Group is granted unilateral termination rights in the event of a breach of anti-corruption commitments by the other party). The licensed entities within the Group may also apply their local anti-corruption policy or practices.

9 Due Diligence

To reduce the potential corruption risks which may occur in the development of business with partner companies, the Group shall conduct due diligence on

business partners with which the Group has business relationships in an appropriate manner based on actual circumstances:

- (1) evaluating the necessity for cooperation with business partners and the real purpose of relevant transactions;
- (2) assessing the commercial reasonableness and fairness of the proposed transaction; and
- (3) identifying whether there have been any violations of anti-corruption laws by said business partners in the past.

10 Gift and Entertainment

The Group does not prohibit small, reasonably priced (as determined by its local legal practices) business gifts and entertainment based on reasonable commercial interests, but such gifts and entertainment shall not create an obligation on either party that affects their impartiality or constitutes an undue influence on their business decisions. The following activities are strictly prohibited:

- (1) illegal gifts under applicable laws;
- (2) any bribe, reward or kickback to obtain or retain business;
- (3) any gift provided to any person who is about to make a business decision involving any company within the Group;
- (4) gifts to obtain special treatment, business incentives, price concessions or more favorable sales terms;
- (5) any gift that, if reported or made public by the media, would subject the Group to moral condemnation, negative publicity, or other embarrassment;
- (6) providing or receiving gifts or entertainment to/from others knowing that they are not allowed to provide or receive such gifts or entertainment under the rules of their own organization or company;
- (7) any gift or benefit which needs to be concealed from other colleagues, direct managers or other relevant parties (to avoid ambiguity, employees shall not conceal any gift or benefit provided or received);
- (8) any gift in cash or cash equivalent; and
- (9) excessively wasteful or extravagant entertainment on business occasions.

For employees of non-licensed entities within the Group who provide or

receive gifts and entertainment, they shall follow the provisions of the *Gift and Entertainment Policy* and abide by relevant procedures. Employees of licensed entities within the Group shall comply with the relevant procedures and provisions of the gift and entertainment policy of their respective licensed entity.

11 Accounting Records

Employees or agents shall not enter into any transaction on behalf of the Group with corrupt intent or with the knowledge that such transaction or payment is different from that stated in the documents confirming or substantiating the transaction or payment.

To enforce the above requirements, all financial operations, accounting details, and entries must be recorded in reliable and sufficient detail in the Group's books and records to be available for reference. Any payments to a third party shall be made to such third party's bank account. Any payments made to an account other than the third party's account must be supported by a written document stating the collection and payment arrangement between the third party and the designated account holder. Any reimbursement requested by a Group employee or agent must be confirmed in writing by appropriate documents (including original receipts, invoices, or other relevant documents).

12 Audit and Internal Control

The Group performs regular internal and external audits of its financial and business activities and continuously monitors the completeness and accuracy of all operational records in its accounting books and compliance with the requirements of applicable regulations and the Group's internal governing documents (including the principles and requirements established in this Policy).

As part of the Group's internal control process, the Group conducts regular checks on the rules and regulations governing the established procedures of its business processes, including checks on the legality of the business and its economic reasonableness and appropriateness of expenses related to the Group's assets.

13 Funding to Government Events

Employees shall not, on behalf of or for the benefit of the Group, contribute to, or in any other way support any political parties or their members (including candidates for political office, election campaigns or political activities), or any political organizations or campaigns.

14 Donations to Charities

In general, employees shall not fund charitable and/or sponsorship activities on behalf of or for the benefit of the Group, nor participate in any other activity to obtain any illegal privileges or priority in connection with commercial activities.

Where donations are necessary under special circumstances, relevant contracts and payment approval procedures shall be performed before the payment is made to ensure that the relevant donations are free from corruption-related issues and that complete and accurate records of payments of the donations shall be made in the accounting books.

15 Training

The Group will carry out annual employee training on this Policy to enhance the Group's anti-corruption compliance culture. Employees shall participate in such training regularly as required by the Group to ensure that they are aware of and familiar with the requirements of this Policy.

16 Annual Commitment

The Group will conduct an annual questionnaire survey to employees of non-licensed entities to check their compliance with this Policy. After the receipt of the questionnaire survey, the employees shall provide statements on their compliance with this Policy based on their actual conditions and ensure that the statements provided are complete and accurate. The licensed entities within the Group may apply their local anti-corruption policy or practices.

17 Reporting of Violations

The Group has established a whistleblower email (ethics@itiger.com) to allow employees and external parties to report any corruption-related conduct or to seek internal guidance on suspicious activities either anonymously or using their real names in Chinese or English. Any Employee who reports such corruption-related conduct in good faith will be appropriately protected by the Group. The Group firmly fights against any on retaliation against whistleblowers and protects their legitimate rights and interests.

Section IV Penalty Provisions

- 18** If an employee is aware of the requirements of this Policy but intentionally violates or conceals his/her non-compliant behaviors, the Group will, determine based on the facts of the case, give him/her warning, record a demerit, terminate their employment contract, or impose other penalties in accordance with internal rules.
- 19** If an employee's violation of this Policy ultimately causes losses to the Group and/or clients, the relevant liable person shall bear corresponding liability to the Group and/or clients. If the relevant liable person is suspected of committing a criminal offence, the Group has the right to transfer such person to judicial authorities in accordance with laws and regulations.

Section V Supplemental Provisions

- 20** In the event of any conflict between this Policy and relevant and applicable laws, regulations, rules and other regulatory documents or any matters not covered in this Policy, relevant laws, regulations, rules, and other regulatory documents shall prevail.
- 21** This Policy shall be amended and interpreted by the Group at its sole discretion.
- 22** This Policy shall be implemented as of the date of promulgation.