

SMOORE International Holdings Limited

Responsible Marketing Policy

Chapter 1 General Provisions

Article 1 Purpose

This policy aims to strengthen the sustainable operation and development of SMOORE International Holdings Limited (hereinafter referred to as the "Company"), ensure that the Company strictly complies with the regulatory laws and regulations of the global electronic atomization industry in its core businesses such as R&D, production, sales and marketing of electronic atomization devices, electronic atomization products and atomization technology solutions, earnestly fulfill corporate social responsibilities, maintain the healthy development of the industry, and protect the legitimate rights and interests of consumers.

Article 2 Scope of Application

This policy applies to the Company and its subsidiaries, as well as all departments, employees, partners and third-party institutions that carry out marketing activities on behalf of the Company, covering all types of online and offline marketing activities, including but not limited to the promotion of electronic atomization products, advertising, market research, customer communication, etc.

Article 3 Basic Principles

1. **Compliance Principle:** Strictly abide by the relevant laws, regulations and regulatory requirements of the global electronic atomization industry, such as China's National Standard for *Electronic Cigarettes* (GB 41700-2022), the European Union's *Tobacco Products Directive* (hereinafter referred to as "EU TPD"), and the *Premarket Tobacco Application* (PMTA) by the US Food and Drug Administration (FDA).
2. **Principle of Protecting Minors:** Resolutely put an end to any form of promotion and sale of electronic atomization products to minors, and take effective measures to prevent minors from accessing the Company's marketing information.

3. **Principle of Authenticity and Transparency:** Marketing content must be true, accurate and complete. False or misleading advertising is not allowed. Key information such as the performance and risks of electronic atomization products must be clearly disclosed.
4. **Principle of Social Responsibility:** Actively fulfill corporate social responsibilities, promote the sustainable development of the industry, and maintain public interests and a sound market order.

Chapter 2 Norms for Marketing Activities

Article 4 Restrictions on Target Audience

1. It is prohibited to carry out any form of marketing activities targeting minors, including but not limited to placing advertisements and conducting promotional activities in places where minors gather (such as around schools and kindergartens); it is not allowed to use the images, voices of minors or elements that induce minors' attention for the promotion of electronic atomization products.
2. The Company's marketing activities shall clearly target adults. In the selection of marketing channels and content design, full consideration shall be given to the age characteristics of the audience to avoid excessive dissemination of marketing information to minors.

Article 5 Advertising and Warning Signs

1. **Authenticity of Content:** Advertising content shall be based on scientific facts and objective data. It is not allowed to exaggerate the performance and efficacy of electronic atomization products, or claim that electronic atomization products have unproven functions such as treatment, health care, and smoking cessation; truthfully disclose the potential risks of electronic atomization products to ensure that consumers can fully and accurately understand the information of electronic atomization products.
2. **Labels and Warnings:** In strict accordance with the requirements of national laws and regulations, health warning signs and relevant risk prompts shall be marked in prominent positions on the packaging of electronic atomization products and

advertising materials. For example, strictly abide by the warning words and graphic signs specified in China's national standards such as *Electronic Cigarettes, Regulations on the Warning Signs of Electronic Cigarettes*, and *Implementation Rules for the Packaging of Electronic Cigarette Products*, as well as the nicotine addiction warnings required by the EU *Tobacco Products Directive* (TPD).

3. **Prohibition of Misleading Advertising:** It is not allowed to use absolute and misleading expressions such as "harmless", "safe" and "low-risk"; it is not allowed to belittle other brands or products through comparison or implication; it is not allowed to conduct improper marketing by taking advantage of consumers' fear.

Article 6 Management of Promotional Activities

1. Promotional activities shall not set up incentive mechanisms that induce excessive consumption, such as more rewards for more purchases; it is prohibited to attract minors to try or purchase electronic atomization products by giving away products, coupons, etc.
2. When holding online and offline promotion activities, strictly check the identity of participants to ensure that the activities are only for adults; obvious age prompt signs and supervision measures shall be set at the activity site.

Article 7 Management of Marketing Channels

1. **Online Channels:** If the Group sells electronic atomization products to individual consumers, it shall not conduct direct advertising of electronic atomization products on social media platforms (such as WeChat, Weibo, Douyin, etc.), search engines, and e-commerce platforms (except for specific platforms permitted by laws and regulations); the official website and online stores of the Company's electronic atomization products shall set up strict age verification mechanisms to prevent minors from accessing and purchasing.
2. **Offline Channels:** If the Group sells electronic atomization products to individual consumers, the sales terminals shall post the sign "It is prohibited to sell electronic cigarettes to minors" in a prominent position. Employees shall take the initiative to verify the identity of purchasers and refuse to sell electronic atomization products

to minors; it is not allowed to set up electronic atomization product display cabinets or conduct promotional activities in areas easily accessible to minors such as around campuses and entertainment venues.

Article 8 Management of Partners

When signing cooperation agreements with partners such as advertising companies, distributors and retailers, clearly stipulate that they shall comply with the marketing requirements of this policy and relevant laws and regulations, and incorporate responsible marketing clauses into the contract.

Chapter 3 Special Measures for the Protection of Minors

Article 9 Identify Verification and Age Verification

1. If the Group sells electronic atomization products to individual consumers, in the product sales process, technical means such as ID card recognition and face recognition shall be adopted to strictly verify the identity information of purchasers to ensure that purchasers are at least 18 years old (in some countries or regions with higher age restrictions, the local laws and regulations shall prevail).
2. If the Group sells electronic atomization products to individual consumers, in the product sales process, technical means such as ID card recognition and face recognition shall be adopted to strictly verify the identity information of purchasers to ensure that purchasers are at least 18 years old (in some countries or regions with higher age restrictions, the local laws and regulations shall prevail).

Article 10 Control of Marketing Information

1. Advertisements for electronic atomization products or brand promotions for electronic atomization products shall not be placed in media channels that minors may access (such as children's programs, youth magazines, campus radio, etc.).
2. Strictly review the marketing content of electronic atomization products officially released by the Company (such as short videos, graphic information, etc.) to avoid elements or expressions that may attract minors' attention.

Article 11 Control of Marketing Channels

Consumers, employees and the public are encouraged to supervise and report illegal acts of selling or promoting electronic atomization products to minors; upon receiving reports, the Company shall immediately investigate, and if the situation is verified, severely deal with the relevant responsible persons and report to the regulatory authorities in a timely manner.

Chapter 4 Supervision and Evaluation

Article 12 Supervision

1. The audit department of the Company shall conduct regular audits of marketing activities every year. The audit content includes the compliance of marketing content, the implementation of measures for the protection of minors, and the performance of partners, to strictly ensure their compliance with this policy.
2. Regularly disclose the implementation and effectiveness of the Company's responsible marketing policy to enhance the transparency and credibility of the Company's marketing activities.
3. Establish an internal supervision mechanism to encourage employees to report acts that violate this policy; appropriate rewards shall be given to employees whose reports are verified, and their personal information and legitimate rights and interests shall be strictly protected.

Article 13 Handling of Violations

1. For departments or individuals that violate this policy, disciplinary actions such as warning, fine, demotion, and termination of labor contracts shall be given according to the seriousness of the circumstances; those who cause serious consequences or adverse social impacts shall be investigated for legal responsibility in accordance with the law.
2. If a partner violates the provisions of this policy, the Company has the right to require it to bear the liability for breach of contract, including but not limited to paying liquidated damages, compensating for losses, and terminating cooperation.

Article 14 Policy Evaluation and Improvement

Comprehensively evaluate the effectiveness and applicability of this policy every year,



and timely revise and improve the content of the policy in consideration of changes in laws and regulations, industry development trends, and the Company's actual operation.

Article 15 Training Management

Training on the Company's responsible marketing policies, laws and regulations related to responsible marketing shall be organized for all employees every year to ensure that all employees are familiar with the requirements of this policy.

Chapter 5 Supplementary Provisions

Article 16 Right of Interpretation

This policy shall be interpreted by SMOORE International Holdings Limited.

Article 17 Effective Date

This policy shall come into force on the date of issuance. In case of any inconsistency between the original relevant provisions and this policy, this policy shall prevail.