



**Bosideng International Holdings Limited**

**波司登國際控股有限公司**

*(incorporated in the Cayman Islands with limited liability)*

**(Stock code: 3998)**

## **RESPONSIBLE MARKETING POLICY**

### **1. APPLICABLE SCOPE**

- 1.1 These Responsible Marketing Policy policy (this “Policy”) is applicable to Bosideng International Holdings Limited (the “Company”) and its subsidiaries (collectively, the “Group”).
- 1.2 This Policy governs the marketing activities of all brands under the Group, including Bosideng, Snow Flying, Bengen, etc. (hereinafter referred to as "the Brands"). It covers advertising, promotions, sponsorships, brand marketing promotions, digital marketing communications, and product packaging. It binds employees and partners responsible for product planning, design, brand marketing promotion, and corporate culture communication within each Brand.

### **2. OVERVIEW**

- 2.1 This Policy aims to regulate marketing communications, ensuring the authenticity, integrity, and inclusiveness of information, effectively protecting consumer rights, while advancing the Group's sustainable development goals. This Policy is committed to supporting the United Nations 2030 Sustainable Development Goals (SDGs), with a particular focus on SDG 3 (Good Health and Well-being), SDG 12 (Responsible Consumption and Production), SDG 13 (Climate Action), and SDG 17 (Partnerships for the Goals). It ensures that all marketing activities comply with relevant laws, regulations, and industry standards, embodying the Group's social responsibility values.

### **3. GUIDINE PRINCIPLES**

- 3.1 Marketing activities conducted by the Group, including their content and methods, must comply with applicable laws, regulations, relevant judicial interpretations, recommended national standards, and industry standards in the jurisdictions where operations are conducted. Examples include the "Advertising Law of the People's Republic of China," "Consumer Rights Protection Law of the People's Republic of China," and "Personal Information Protection Law of the People's Republic of China." For overseas business segments, locally applicable legal requirements and industry codes must also be identified and adhered to. Concurrently, the Group has established relevant internal systems, stipulating that marketing activities shall be conducted based on principles of truthfulness, integrity, accuracy, non-discrimination, avoidance of exaggerating environmental and social benefits, protection of vulnerable groups, and opposition to unfair competition (including avoiding misleading claims about competitors' products), thereby safeguarding the legitimate rights and interests of consumers.

## 4. RESPONSIBLE MARKETING MEASURES

### 4.1 Strict Review of Marketing Content

4.1.1 Compliance with Laws, Regulations & Company Systems: The Group rigorously reviews the content of marketing activities for all Brands in accordance with relevant laws, regulations, and company systems/charters, ensuring compliance with principles of truthfulness, integrity, and non-discrimination. The dissemination of false information about competitors is prohibited. Product quality and value must be presented truthfully. Human rights must be respected. Incitement or tolerance of any form of discrimination is forbidden. Content involving violence, abuse, exploitation, or other illegal activities or violations of public order and good morals is strictly prohibited.

4.1.2 Avoid Misleading Statements: Misleading statements are not permitted during marketing. Transparency regarding the social and environmental impacts of products must be maintained, and exaggeration of such impacts is opposed. When verifiable facts are involved, corresponding supporting documentation must be available.

4.1.3 Special Attention to Children, Adolescents, and Vulnerable Groups: Images of children, adolescents, and vulnerable groups in marketing communications must be presented in a safe, positive, and healthy manner. For marketing activities involving children, the presence of a legal guardian and their written consent is required. Furthermore, marketing content should avoid directly inducing children to consume.

4.2 Enhance Customer and Consumer Service: Upholding the Company's core values of "Customer First, Open Innovation, Value Delivery, Strive for Excellence," the Group strictly adheres to laws and regulations such as the "Consumer Rights Protection Law of the People's Republic of China." Consumer requests are treated and handled seriously to protect their legitimate rights and interests. By continuously improving the customer service system, conducting efficient customer communication, and responding to requests promptly, the Group aims to deliver high-quality service experiences and enhance consumer satisfaction.

4.3 Emphasis on Personal Privacy and Data Security Protection: The Group places high importance on the privacy and security of customers and consumers, strictly following laws and regulations such as the "Cybersecurity Law of the People's Republic of China," "Data Security Law of the People's Republic of China," and "Personal Information Protection Law of the People's Republic of China." Additionally, all products and services provided through official Brand online stores and physical shops must comply with the Group's internally established "Personal Information Protection Management System." A "Privacy Policy" is publicly displayed to consumers, clearly outlining information collection, use, protection, and user rights.

4.4 Marketing Compliance Training: The Group Brand Management Center and the Group Legal & Compliance Center conduct compliance marketing training for relevant departments, including those responsible for product planning, design, and brand promotion, as well as those handling corporate culture communication. Training content includes, but is not limited to, relevant marketing laws and regulations applicable within China. Training formats include, but are not limited to, video courses uploaded to the internal training platform for employee learning. Furthermore, prior to major promotional events on relevant e-commerce platforms, the Group provides focused interpretations of key compliance marketing regulations and promotes them through various channels such as email and official WeChat accounts. This continuously reinforces employees' legal

awareness, standardizes marketing behavior, and protects consumers' legitimate rights and interests.

#### 4.5 Full Consideration of Cultural Sensitivity

4.5.1 The timing, context, and language used in promotions must be carefully considered to avoid exploiting or appropriating stereotypes. Diverse cultures must be fully respected, and diverse perspectives explored, ensuring marketing activities align with Group values. Different identities and viewpoints should be embraced inclusively; discrimination is prohibited, as is the promotion or condoning of violence or dangerous behavior. For marketing related to significant cultural themes, the Group will consult with relevant cultural experts or community representatives during the planning phase to ensure the accuracy and sensitivity of the marketing content.

4.5.2 The profound impact of products and communications on different audiences must be clearly understood. The Group commits to collaborating with models and endorsers whose image aligns with each Brand's culture and values. Selection criteria prioritize ensuring promotional activities and maintaining a safe, positive, and healthy product image. Participation by celebrities involved in negative behaviors such as drug abuse or drunk driving is strictly prohibited.

4.6 Responsible Digital Advertising: Content promoted through digital advertising channels must be honest, accurate, and adhere to fundamental ethical standards. The Group commits to dedicating necessary resources to ensure compliance with applicable regulations, protecting consumer privacy and ensuring product transparency on digital platforms. Simultaneously, false advertising is avoided, upholding the sincere commitment to responsible marketing.

4.7 Search Engine Optimization (SEO): Ensure that search engine optimization practices are consistent with this Responsible Marketing Policy. Avoid unethical SEO practices such as deception, excessive optimization, or content cloaking.

4.8 Partner Management: The Group requires partners to sign legally binding "Compliance and Integrity Agreements," explicitly stating that they must strictly adhere to the Group's relevant policies and requirements to ensure the legality and compliance of marketing activities during collaboration.

### 5. IMPLEMENTATION AND SUPERVISION

5.1 The Group will periodically review and evaluate the implementation of this Policy. This Policy is jointly issued by the Group Brand Management Center and the Sustainable Development Steering Group. These entities are responsible for reviewing potential non-compliance incidents within the Group's marketing activities. Review methods include, but are not limited to, routine audits of daily marketing activities and compliance document checks. Additionally, the Group Brand Management Center and the Sustainable Development Steering Group will regularly report on implementation status to the Board of Directors. Based on the Group's operations and development, they may propose revisions or supplements to this Policy to the Board from time to time for its improvement.

### 6 CIRCULATION AND REVISION

6.1 The Group reserves the right to revise, alter or abolish this Policy from time to time. The Group will regularly review this Policy and make revisions when necessary. The latest

version of this Policy is available on the Company's official website at <http://company.bosideng.com>.