

## Temu's Third Party Code of Conduct

Temu is committed to ethical, humane, and lawful business practices. Anyone doing business directly with Temu must ensure their and their suppliers' strict compliance with this code of conduct and with all applicable local, national, and international laws. Temu explicitly reserves the right to terminate any business relationship if a third party acts not in accordance with this code of conduct or the law.

*Ethics:* Ethics is at the forefront of everything we do here at Temu. We believe in conducting business with integrity and honesty.

*Anti-Bribery & Anti-Corruption:* All Temu employees, contractors, merchants, suppliers, and other third parties are strictly prohibited from offering or accepting improper payments or benefits. \*De minimis gifts or in kind offers (i.e., value of less than \$50 USD) are permitted so long as such gifts or in kind offers do not induce the recipient to perform or act in a certain manner.

*Conflicts of Interest & Self-Dealing:* Temu employees, contractors, merchants, suppliers, and other third parties cannot use their position to obtain benefits for oneself or their relatives. Temu will not offer preferential treatment or business terms to third parties on the basis of their relationship(s) with Temu and its employees, contractors, merchants, suppliers, and other third parties. Anyone doing business with Temu must disclose relationships that may present a conflict of interest, or the appearance of one.

*Antitrust & Anti-Competitive Behavior:* Temu does not tolerate price fixing, geographic monopolization, and merchant sabotage or merchant gaming.

*Human Rights:* Temu respects and seeks to protect and advance the human rights of everyone everywhere.

*Harassment & Discrimination:* Third parties will not engage in unlawful harassment, discrimination, abuse, or retaliation on the basis of race, gender, gender expression, color, ethnicity, citizenship status, sexual orientation, disability, pregnancy, age, marital status, union membership, religious affiliation, and/or political affiliation. This anti-discrimination policy applies to the formation of contracts, the execution of duties related to employment, training, payment for services or products rendered, and in other contexts.

*Obscene Content:* Temu does not tolerate the posting of obscene or harmful content, especially content involving or depicting children. Any content that involves child pornography or violence against children will be immediately reported to law enforcement authorities.

*Sanctions:* Temu does not work with third parties from sanctioned countries; and it does not permit offering products (or components of products) for sale that originated in or were manufactured using component parts from sanctioned countries.

*Labor:* Anyone doing business with Temu is required to strictly comply with all regulatory standards and compliance requirements. The use of forced, penal, or child labor is strictly prohibited. Employment by all our merchants and suppliers must be strictly voluntary. They shall respect the freedom of association and workers' rights to collectively bargain.

*Wages & Hours:* Temu's merchants, suppliers, and other third parties must pay their employees and contractors on time and must comply with all applicable local wage and hours laws.

*Occupational Safety:* All environments in which third parties work on behalf of or in conjunction with Temu and Temu's merchants must be safe and non-abusive. This means that all facilities and places of manufacture must meet applicable occupational, occupancy and fire codes and regulations.

*Environmental Protection:* We strive to protect the environment and natural ecosystems in everything we do. To that end, Temu offsets a portion of carbon emissions generated by its

business. Our merchants, contractors, suppliers, and other third parties we do business with are prohibited from using hazardous chemicals in their products, or in their manufacturing facilities. Third parties agree they will not dump hazardous materials into the air and/or waterways.

*Miscellaneous:*

*Confidentiality:* All third parties that do business with Temu and Temu's merchants must maintain the confidentiality of the information in their possession. Disclosure of such information shall have prior written approval and shall only be for a legitimate business purpose.

*Data Protection:* Temu employs technical measures to safeguard the data of its customers, merchants, suppliers, contractors, and other third parties. Third parties must disclose to Temu any data breaches or unauthorized access to personal data.

*Intellectual Property:* Temu respects the intellectual property rights of others and takes claims of infringement and/or misappropriation very seriously. Similarly, Temu's intellectual property (e.g., word marks, logos, images, etc.) is not to be used or appropriated without Temu's express written authorization. Temu has a repeat infringer policy and Temu will enforce the intellectual property rights of others by accepting submissions to [ipprotection@temu.com](mailto:ipprotection@temu.com).

*Inspection & Audit:* Temu reserves the right to inspect manufacturing facilities, warehouses, and other places in the supply chain in order to ensure compliance with the Code of Conduct and the law.

Merchants, contractors, suppliers, and other third parties shall maintain adequate records for audit and shall make their facilities available for random inspections. Third parties must warrant that their representations are accurate and not misleading. Deceptive omissions by third parties will not be tolerated.

*Product Compliance:* All product packaging and products offered for sale on Temu's platform by its third-party merchants and suppliers shall conform to international trade laws and suitability for use regulations. Never bring products or packaging to market that may cause harm to Temu's customers.

*Report Violations:* If you wish to confidentially and anonymously report violations of the Code of Conduct, you may do so by either sending an email to [ethics@temu.com](mailto:ethics@temu.com) or by mail to: Legal Department, Whaleco Inc., 31 St. James Avenue, Suite 355, Boston, Massachusetts 02116.