

Policy of Equal Opportunity and Anti-Discrimination & Harassment and Retaliation

Section I Overview

- 1.1 UP Fintech Holding Limited, its subsidiaries, and consolidated affiliated entities (the “**Company**”) expect to maintain a work environment in which all employees are treated with respect and dignity. The purpose of these policies is to communicate the Company’s requirement for all employees to interact in a professional manner and contribute to a work environment that reflects the spirit of equal opportunity employment free from prohibited harassment, discrimination and/or retaliation. These policies also establish our reporting procedures and processes for responding to claims of inappropriate behavior and perceived harassment, discrimination and retaliation so that issues can be identified and remedied promptly, thoroughly and effectively.
- 1.2 The employment aspects of this Equal Opportunity Policy require that all employment decisions regarding applicants and employees be non-discriminatory, based only on valid job requirements, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions. Any employee who is found to have violated the anti-discrimination or anti-retaliation provisions of this Equal Opportunity Policy with respect to another individual will be subject to corrective action, up to and including termination.
- 1.3 No form of discrimination, harassment, inappropriate or abusive conduct is tolerated by or against employees, customers, vendors, contractors or any other individuals who conduct business with the Company. All employees, including managers and employees in non-managerial positions, are required to promote equal opportunity and prevent discrimination, harassment and inappropriate and abusive conduct. They are also expected to help create and maintain an atmosphere where concerns under this Policy can be raised without fear of retaliation or intimidation.
- 1.4 This Policy applies to conduct at the Company’s offices, work locations and while engaged in work-related activities outside the workplace, such as business-related trips, social events and other activities.

Section II Policy Statements

2.1 Equal Opportunity

The Company is committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based

on race, ethnicity, religion, gender, age, national origin, color, ancestry, age, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, gender identity and/or gender expression.

It is also the Company's policy to provide reasonable accommodation to qualified individuals with disabilities and to the sincerely held religious beliefs, practices or observance of applicants or employees so long as such accommodation does not pose an undue hardship.

2.2 Prohibition Against Workplace Harassment

The Company does not tolerate any form of mistreatment in the workplace. All workers will be treated with dignity and respect and will not be subject to any form of unethical treatment, sexual harassment, abuse, corporal punishment or mental, physical, or verbal coercion, or the threat of any such treatment. Disciplinary policies and procedures in support of these requirements should be clearly defined and communicated to each employee.

Harassment can be any single incident or pattern of behavior where the effect, intentional or unintentional, creates a hostile, offensive, or intimidating work environment based upon any of the above classifications. Harassing behaviors can include (but are not limited to) unwelcome comments that are gender-based, sexual, or ethnic in nature; religious slurs; racial insults; unwanted touching or sexual advances or requests; age-based remarks; jokes, epithets, inappropriate or derogatory comments, emails, voice mails, or written or pictorial material that makes fun of or insults an individual or a group based upon a protected classification; or similar inappropriate remarks or behavior. Harassment may also include inappropriate comments or conduct between or among individuals in the same protected classification.

Quid pro quo harassment may occur when someone in a position of authority or influence asks for or requests some romantic or sexual conduct from someone else, and in exchange, offers some benefit to the other person's employment if the request is accepted, or threatens some detriment to the other person's employment if the request is rejected.

Hostile work environment harassment may occur when an individual engages in unwelcome visual, verbal, or physical conduct based on or because of sex (or any other characteristic covered by the Company's policy), and where this conduct is either so severe or pervasive that it unreasonably interferes with an employee's work performance or creates a hostile, intimidating, or offensive work environment.

2.3 Complaints

All managers of the Company are responsible for abiding by the terms set forth in this Policy, establishing equal opportunity as an integral part of their personnel decisions, encouraging employees to bring their concerns forward and preventing harassment, discrimination, and/or retaliation in the workplace. All managers and supervisors who receive a complaint of or otherwise observe or become aware of any potential discrimination, harassment, or retaliation, or who receive a request or are aware of an individual's potential need for an accommodation with regard to their employment, must promptly report that issue to Human Resources for appropriate investigation and handling.

Since all Company personnel have an obligation to contribute to a discrimination- and harassment-free workplace, all employees are strongly encouraged to report any violation of this Policy through one of the Company reporting avenues identified below.

If you believe that you have been subjected to discrimination, harassment or retaliation, or other behavior that violates the Company's Equal Opportunity Policy, you should tell the offender that his or her behavior is offensive and should be stopped. You should also promptly report your concerns to your manager or next-level manager or Human Resources.

2.4 Prohibition Against Retaliation

The Company also prohibits retaliation against any individual who in good faith complains of perceived harassment or discriminatory conduct, participates in a Company or agency investigation into such complaints, or engages in other protected activity.

Every employee is encouraged to come forward without fear of reprisal, as the Company's Equal Opportunity Policy prohibits any and all forms of retaliation against anyone who makes a good faith complaint pursuant to this Policy, or who otherwise participates in a Company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been or may be subjected to retaliation for making or cooperating in the investigation of a complaint under this Equal Opportunity Policy, please promptly notify your manager or next-level manager or Human Resources. Concerns of retaliation will be investigated and addressed in the same manner as allegations of discrimination and harassment.

2.5 Investigation Procedures and Disciplinary Measures

After the Company receives a complaint alleging a violation of the Company's Equal Opportunity Policy, the Company will conduct a prompt, thorough, and

impartial investigation and take corrective action as appropriate based upon information obtained during its investigation. Employee complaints and investigations will be kept confidential to the extent possible. However, complete confidentiality is not guaranteed. No one, regardless of position or length of service, is exempt from this Policy.

At the conclusion of the investigation, the Company will promptly initiate any appropriate responsive action. Responsive action may include, for example, training, referral to counseling, monitoring of the offender and/or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension without pay or termination, as the Company believes appropriate under the circumstances.

An employee who has made a complaint of discrimination or harassment and does not agree with its resolution may appeal the matter to the Chief Compliance Officer.

Section II Miscellaneous

3.1 Training

Frequent training and awareness programs for employees are designed to promote a workplace free of discrimination and harassment. The training includes harassment-free workplace and anti-sexual harassment scenarios and questions.

3.2 Conclusion

This Policy should not, and may not, be used as a basis for excluding or separating individuals on the basis of any protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment.