

Huaqin Technology Co., Ltd.

Anti-Discrimination and Anti-Harassment Policy

Article I Purpose

Huaqin Technology Co., Ltd. and its subsidiaries (hereinafter referred to as “Huaqin Technology”) are committed to upholding the principle of equal employment opportunity and to fostering a workplace environment in which all employees are treated with respect and dignity. The Company firmly opposes any form of discrimination, harassment, or other insulting conduct, and adopts a zero-tolerance approach toward all harassment, discrimination, and other insulting behaviors occurring in the workplace and in the course of business operations.

Article II Scope of Application

This commitment and policy apply to all employees of Huaqin Technology Co., Ltd. and its subsidiaries, and suppliers and business partners are encouraged to adopt and comply with them.

Article III Anti-Harassment and Anti-Discrimination Policy

- (i) Huaqin Technology adheres to the principle of equal employment and follows the principles of fairness, openness, and impartiality in recruitment, employment, training, promotion, and compensation and benefits. No discrimination shall be permitted in employment, job assignment, wages, benefits, training opportunities, promotion, disciplinary actions, dismissal, or retirement on the basis of race, age, gender, sexual orientation, ethnicity, geographic region, disability, religion, political affiliation, trade union membership, military status, nationality, marital status, pregnancy, health status, social class, or physical characteristics (including height, weight, eyesight, and place of birth), among other factors.
- (ii) Huaqin Technology is committed to building an equal, diverse, and inclusive workplace, ensuring that employees are able to grow and develop in an environment of mutual respect, free from any form of harassment or

discrimination, including but not limited to offensive, insulting, discriminatory, hostile, or sexually harassing behavior, and other improper conduct. The Company undertakes to provide a harassment-free workplace environment and adopts a zero-tolerance policy toward any form of workplace harassment. The conduct prohibited under this Article includes, without limitation, the following forms of harassment:

① Sexual harassment

Engaging in conduct related to sex or gender against another person's will, where any of the following circumstances applies:

A. Making another person's submission to or rejection of such conduct a condition for the acquisition, loss, or reduction of rights or interests related to employment, education or training, services, programs, or activities;

B. By displaying or disseminating written materials, images, sounds, videos, or other items, or through discriminatory or insulting words or actions, or by other means, impairing another person's personal dignity, or creating an intimidating, hostile, or offensive environment, or improperly affecting the conduct of their work, education, training, services, programs, activities, or normal life.

② Other harassment

Physical harassment, violent harassment, psychological harassment, verbal harassment, or abusive conduct, or harassment arising from another person's place of birth, race, skin color, age, gender, sexual orientation, gender identity and expression, ethnicity, class, nationality, disability, medical history (such as HIV/AIDS), pregnancy, language, ideology, religion, belief, party affiliation, political stance, organizational background, veteran status, former trade union membership, protected genetic information, marital status, appearance, facial features, or other personal characteristics, as well as other unlawful harassment.

③ Stalking harassment

Stalking harassment refers to the repeated or continuous engagement, against

a specific person's will and in a manner related to sex or gender, in any of the following acts by means of persons, vehicles, tools, equipment, electronic communications, the Internet, or other methods in the workplace, thereby causing fear and being sufficient to affect the person's daily life or social activities:

A. Monitoring, observing, tracking, or otherwise becoming aware of the whereabouts of a specific person;

B. Approaching a specific person's workplace, or places that the person frequently enters or visits due to work, by means of tailing, waiting, following, or other similar methods;

C. In the workplace, directing warnings, threats, mockery, insults, discrimination, hatred, derogatory remarks, or other similar words or actions toward a specific person;

D. In the workplace, interfering with a specific person by means of telephone, fax, electronic communications, the Internet, or other devices;

E. Using work-related opportunities to request dates, contact, or engage in other pursuit behaviors toward a specific person;

F. In the workplace, sending, leaving, displaying, or disseminating written materials, images, sounds, videos, or other items to a specific person;

G. In the workplace, informing a specific person of, or presenting to them, information or items that are harmful to their reputation;

H. Abusing specific personal data obtained through work, or, without the consent of the data subject, using such personal data to order goods or services.

(iii) Huaqin Technology treats harassment and discrimination with seriousness and includes discriminatory and harassing conduct within the scope of employee ethics and compliance review. Where any harassment constitutes a criminal offense, the Company shall, in accordance with the law, transfer the case to the public security authorities for handling; where it does not constitute a criminal offense, the Company shall handle the matter in accordance with the

Administrative Regulations on the Handling of Employee Violations of Huaqin Technology Co., Ltd.

- (iv) Huaqin Technology is committed to fostering a positive social atmosphere, actively enhancing employees' awareness of anti-harassment and anti-discrimination, and conducting workplace anti-harassment and anti-discrimination training for all relevant parties, while encouraging suppliers and business partners to take proactive measures to eliminate harassment, discrimination, and similar conduct in the course of their operations;
- (v) All employees of Huaqin Technology are implementers and supervisors of this Policy and bear a greater responsibility to report violations in accordance with the provisions;
- (vi) With respect to violations of this commitment and policy or any other Huaqin Technology policies, all stakeholders may provide feedback at any time through the reporting channels.

Article IV Complaints and Reporting

The Internal Control Committee of Huaqin Technology Co., Ltd. accepts reports and complaints concerning all types of improper conduct and encourages employees to report violations and non-compliant conduct, and to submit opinions and suggestions. In special circumstances, reports may be made directly to the Board of Supervisors or the Board of Directors.

The Company encourages employees to make reports under their real names and shall strictly safeguard the lawful rights and interests of whistleblowers.

Article V Channels for Complaints and Reporting

(i) Internal complaints and reporting

Internal reporting channels include, without limitation, the Internal Control Committee, the Human Resources mailbox, and the employee relations complaint hotline. Whistleblowers may submit reports by letter, email, telephone, in person, or other means, and anonymous reporting is also permitted. The specific channels are as follows:

Internal Control Committee:

(1) Mailing address: Internal Audit and Compliance Group, Building 1, No. 399 Keyuan Road, Pudong New Area, Shanghai

(2) Telephone: 18516617679 (independent hotline, managed by dedicated personnel)

(3) Email: report@huaqin.com

(4) On-site reporting receiving department: Internal Audit and Compliance Group

Human Resources mailbox: ssczx@huaqin.com

Employee relations complaint hotline: 4008913788

(ii) External complaints and reporting

(1) Telephone: 18516617679 (independent hotline, managed by dedicated personnel)

(2) Email: report@huaqin.com

The Company places great importance on the protection of whistleblowers, has established sound reporting mechanisms and systems, clearly stipulates the protection of whistleblowers' rights and interests, strictly protects the information of real-name whistleblowers, and prohibits any form of retaliation.

Article VI Review and Revision

Huaqin Technology shall regularly review this Policy, update it where necessary, and approve and issue it accordingly.

Huaqin Technology Co., Ltd.

June 19, 2024