

Huaqin Technology Co., Ltd.

Human Rights Policy

Article I Purpose

Huaqin Technology Co., Ltd. and its subsidiaries (hereinafter referred to as “Huaqin Technology”) firmly believe that respecting human rights and creating a workplace with dignity are of vital importance. The Company commits to supporting the following international human rights standards and norms, while strictly complying with the laws and regulations applicable at its operating sites worldwide, and to treating and respecting all individuals equally.

Article II Scope of Application

This commitment and policy apply to all employees of Huaqin Technology Co., Ltd. and its subsidiaries, as well as to related enterprises, affiliated enterprises, suppliers, contractors, partners (including customers and communities), and other stakeholders, with the aim of eliminating any form of human rights infringement.

Article III Referenced Standards and Policies

Universal Declaration of Human Rights (UDHR)

United Nations Guiding Principles on Business and Human Rights (UNGPs)

ILO Declaration on Fundamental Principles and Rights at Work

OECD Guidelines for Multinational Enterprises

OECD Due Diligence Guidance for Responsible Business Conduct

Responsible Business Alliance Code of Conduct

Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

Women’s Empowerment Principles (WEPs)

Convention on the Rights of the Child (CRC)

UN Children’s Rights and Business Principles (CRBP)

Other laws and regulations applicable to operating sites domestically and abroad

Article IV Human Rights Commitments

(i) Respect for Human Rights

Huaqin Technology respects the laws and regulations, religious cultures, and histories of all operating locations, and on this basis respects and safeguards the fundamental human rights of all employees.

(ii) Diversity and Non-Discrimination

Huaqin Technology respects the diversity of employees, suppliers, business partners, communities, and all stakeholders. Any discrimination based on race, color, gender, gender identity, sexual orientation, marital status, language, age, nationality, religious belief, political opinion, citizenship, ancestry, physical or mental disability, pregnancy, disease, or any other legally protected characteristic is strictly prohibited.

(iii) Prohibition of Forced Labor

Huaqin Technology does not employ any form of forced, bonded (including debt-bonded), or indentured labor, prison labor, enslaved persons, or trafficked persons, and shall not transport, harbor, recruit, transfer, or receive such labor or services through threats, coercion, compulsion, abduction, or deception. Employees' personal freedom shall not be restricted; identity documents shall not be retained; and employees shall not be required to pay deposits, recruitment fees, or any other fees to employers or agents.

(iv) Lawful Employment

Huaqin Technology strictly complies with the laws and regulations of the countries in which it operates and the requirements of the International Labour Organization, prohibits the use of child labor, lawfully employs young workers, and effectively protects employees' lawful rights and interests. If child labor is identified, assistance and remediation measures will be provided.

(v) Humane Treatment

All individuals shall be treated with dignity and respect. Any form of gender-based violence, sexual harassment or other forms of harassment, sexual assault, corporal punishment, mental or physical coercion, bullying, public humiliation,

or verbal abuse, among others, is strictly prohibited, and no threats to engage in any such conduct are permitted.

(vi) Compensation, Benefits, and Working Hours

Huaqin Technology complies with the laws and regulations of the countries or jurisdictions in which it operates regarding compensation, social security, and working hours. Employees shall be provided with remuneration and benefits in accordance with applicable laws, including minimum wages, overtime pay, paid leave, and legally mandated benefits. Wage deductions shall not be used as a disciplinary measure. Pay statements shall be provided to inform employees of wage structure and payment cycles. The use of temporary workers, dispatched workers, and outsourced labor shall comply with local legal requirements.

(vii) Freedom of Association and the Right to Collective Bargaining

Huaqin Technology respects the rights of all employees to voluntarily establish and join trade unions, engage in collective bargaining and peaceful assembly, as well as the right to refrain from participating in such activities. Effective labor-management communication mechanisms shall be established, with regular communication with employees or their representatives. Employees and/or their representatives shall be able to openly communicate and express views and concerns with management regarding working conditions and management practices without fear of discrimination, retaliation, threats, or harassment.

Article V Grievance and Remedy

The Internal Control Committee of Huaqin Technology Co., Ltd. accepts reports and complaints concerning various forms of improper conduct and encourages employees to report violations, 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 report under their real names and shall strictly safeguard the lawful rights and interests of whistleblowers.

Once a human rights infringement caused or contributed to by Huaqin Technology is confirmed, Huaqin Technology shall initiate remediation mechanisms based on the nature of the incident and, where necessary, cooperate with relevant stakeholders to prevent recurrence.

Article VI 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 VII 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