

# 人权政策 Human Rights Policy

作为一家新能源高新技术企业,固德威技术股份有限公司(简称固德威)在全公司范围内倡导和鼓励尊重人权。固德威还期望各级管理人员和员工尊重所有利益相关者的人权,以确保所有利益相关者群体的基本权利得到平等尊重。

As a new energy high-tech enterprise in China and abroad, the GoodWe Technologies Co., Ltd., or GoodWe, promotes and encourages respect of human rights throughout the company. GoodWe also expects executives and employees in all levels to respect human rights of all stakeholders in order to ensure that the basic rights of all stakeholder groups are respected equally.

### 范围

### Scope

本人权政策适用于固德威运营、子公司和合资企业的所有董事、高管和员工。该政策展示了我们如何尊重我们的员工、供应商、承包商、分包商、政府、客户和当地社区的人权。固德威承诺尊重人权,遵守国家和国际层面有关人权保护的法律法规。

This Human Rights Policy applies to all directors, executives, and employees across GoodWe's operations, subsidiaries, and joint ventures. The Policy demonstrates how we respects human rights of our employees, suppliers, contractors, sub-contractors, governments, customers, and local communities around GoodWe's operations. GoodWe commits to respect human rights and comply with the laws and regulations governing the protection of human rights at the national and international levels.

### 定义

#### **Definition**

员工:指根据劳动合同受聘于本公司所有岗位的员工。

Employee: This refers to GoodWe's employees who are employed under employment contracts in all positions.

业务合作伙伴:指代理商、说客和其他中介机构、联营公司、合资企业和财团合作伙伴、政府、客户和客户。 Business Partners: This refers to agents, lobbyists and other intermediaries, associate companies, joint venture and consortia partners, governments, customers, and clients.

供应商:指负责为本公司提供原材料、设备和服务的公司、个人或个人团体。这包括供应商、承包商、分包商、经纪人、顾问、分销商、特许经营商或被许可人、家庭工人、独立承包商、制造商、初级生产商和批发商。

Suppliers: This refers to companies, individuals, or groups of individuals who are responsible for



supplying raw materials, equipment, and services for GoodWe. This includes suppliers, contractors, sub-contractors, brokers, consultants, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, and wholesalers.

客户: 指从固德威购买产品和服务的公司。

Customers: This refers to the companies that purchase products and services from GoodWe.

社区: 指固德威业务周围的当地政府和当地社区。

Community: This refers to local government and local communities around GoodWe operations.

### 指导方针

### **Guidelines**

固德威根据《联合国工商业与人权指导原则》(UNGP)、《联合国全球契约原则》(UNGC)、《联合国世界人权宣言》(UNDHR)和国际劳工组织核心公约(ILO公约)定期开展人权尽职调查。

GoodWe regularly conducts human rights due diligence in accordance with the UN Guiding Principles on Business and Human Rights (UNGP), Principles of the United Nations Global Compact (UNGC), United Nations Universal Declaration of Human Rights (UNDHR), and the Core Conventions of the International Labor Organization (ILO Conventions).

固德威尽职调查流程包括固德威运营、子公司和合资企业及其价值链或与其业务相关的活动的人权风险评估。 人权问题和标准也被用作并购、合资或任何新商业投资的评估标准。在已发现风险的地方实施人权缓解和补救 措施。

GoodWe due diligence process includes human rights risk assessment in GoodWe operations, subsidiaries, and joint ventures and its value chain or activities related to its business. Human rights issues and criteria are also used as assessment criteria in merger and acquisition, joint venturing, or any new business investment. Human Rights mitigation and remediation are implemented where risks have been identified.

人类风险评估涵盖多个权利人和弱势群体,例如我们经营所在国家的妇女、儿童、土著人民、移民劳工、第三方合同工、残疾人、孕妇和遭受人权侵犯的女同性恋者、男同性恋者、双性恋者、跨性别者。

The human risk assessment covers several right holders and vulnerable groups such as women, children, indigenous people in the country where we operate, migrant labor, third party contracted labor, disabled people, pregnant women, and LGBTQI+ that are subjected to human rights violations.



#### 内部职责分配

## Internal responsibility allocation

#### 治理架构 Governance Structure

建立 "董事会-ESG 战略与管理委员会-ESG 执行层" 三级劳工人权体系,明确决策、监督、执行的分层责任机制:

Establish a three - level labor human rights system of "Board of Directors - ESG Strategy and Management Committee - ESG Execution Layer", and clarify the hierarchical responsibility mechanism for decision - making, supervision, and execution:

董事会:审批人权政策及中长期目标,审议人权绩效报告,对重大人权事项作出决策,保障劳工人权战略与公司整体发展方向一致。

Board of Directors: Approve human rights policies and medium- and long-term goals, review human rights performance reports, make decisions on major human rights issues, and ensure that the labor human rights strategy is consistent with the overall development direction of the company.

ESG 战略与管理委员会:由集团 ESG 重大议题领导小组、EHS 委员会、信息安全委员会和可持续发展研究院组成,负责人权政策落地规划、跨部门资源协调及目标拆解,每年向董事会专题汇报政策实施进展,确保劳工人权工作有序推进。

ESG Strategy and Management Committee: Composed of the Group's Leading Group for Major ESG Issues, EHS Committee, Information Security Committee, and Institute of Sustainable Development. It is responsible for formulating plans for the implementation of human rights policies, coordinating cross - departmental resources, and breaking down goals. It reports the progress of policy implementation to the board of directors on a special topic annually to ensure the orderly progress of labor and human rights work.

ESG 执行层:牵头人权政策执行、人权数据监测统计、人权合规审核,组织开展 SA8000 审核及 ISO 45001 等体系认证维护,为各业务单元提供环保技术支持。

ESG implementation layer: Take the lead in implementing human rights policies, monitoring and statistics of human rights data, and human rights compliance review. Organize SA8000 audits and maintain system certifications such as ISO 45001. Provide environmental protection technology support for each business unit.

各业务单元:设立专职/兼职劳工人权员,负责本单元日常劳工人权措施执行、人权问题收集反馈,组织本单元员工参与人权培训。

All business units: Appoint full-time/part-time labor human rights officers to be responsible for the implementation of daily labor human rights measures in the unit, the collection and feedback of human rights issues, and organize the unit's employees to participate in human rights training.



#### 责任机制 Responsibility mechanism

将人权绩效纳入各部门及管理层 KPI 考核体系,实行 "环保一票否决制" ,对劳工人权工作突出的部门与个人 予以表彰,对违规部门进行问责。

Incorporate human rights performance into the KPI evaluation system of all departments and management levels, implement the "one-vote veto system for environmental protection", commend departments and individuals that have made outstanding achievements in labor and human rights work, and hold accountable departments that violate regulations.

建立全员人权责任体系,每年组织不少于 2 次人权专题培训,确保全体员工掌握岗位相关人权要求与操作规范,鼓励员工提出人权合规改进建议。

Establish a human rights responsibility system for all employees, and organize at least two special human rights training sessions every year to ensure that all employees master the human rights requirements and operation specifications related to their positions. Encourage employees to put forward suggestions for improving human rights compliance.

### 员工健康与安全

## **Employee Health and Safety**

公司承诺围绕光伏逆变器生产、储能设备研发、高压测试等业务场景构建 "零伤害" 工作环境,为生产车间操作岗(如逆变器组装、焊接)配备防尘口罩、耐高温于套等防护设备,为研发实验室(如储能电池测试)配备防化服、护目镜,每月检查维护确保 100% 有效;制定《职业健康安全操作规程》,明确高压测试等高危岗位规范,员工需经过 40 课时以上专项培训并持证上岗,年度复训;各基地设经急救培训的应急小组,每年开展消防、化学品泄漏等演练,配置急救箱并与医院建立 "绿色通道";为全体员工购买工伤保险,每年组织职业健康体检(高危岗位加专项检查),每半年开展心理健康评估,为海外项目组等岗位提供一对一疏导。每半年开展心理健康评估,为海外项目攻坚组等岗位提供一对一疏导。

The company promises to build a "zero-injury" working environment around business scenarios such as photovoltaic inverter production, energy storage equipment R & D, and high-voltage testing. It will equip production workshop operators (e.g., inverter assembly and welding) with protective equipment such as dust masks and high-temperature-resistant gloves, and equip R & D laboratories (e.g., energy storage battery testing) with chemical protective suits and goggles. These protective equipment will be inspected and maintained monthly to ensure 100% effectiveness. The company formulates the "Occupational Health and Safety Operating Procedures" to clarify the norms for high-risk positions such as high-voltage testing. Employees are required to undergo more than 40 hours of specialized training, obtain relevant certificates before taking up their posts, and participate in annual retraining. Each base will set up an emergency response team with first-aid training, conduct drills on fire protection and chemical leakage annually, configure first-aid kits, and establish a "green channel"



with hospitals. The company will purchase work-related injury insurance for all employees, organize annual occupational health check-ups (with additional specialized examinations for high-risk positions), conduct mental health assessments every six months, and provide one-on-one counseling for overseas project teams and other positions.

以 2023 年为基准年,至 2030 年年度应急演练覆盖率 100%,年度员工健康体检参与率 100%,年度生产安全事故发生率≤0.1%。

Taking 2023 as the baseline year, by 2030, the annual coverage rate of emergency drills will reach 100%, the annual participation rate of employee health check-ups will reach 100%, and the annual incidence rate of production safety accidents will be  $\leq 0.1\%$ .

### 工作条件

## **Working conditions**

公司承诺结合行业特性提供安全舒适的工作环境,合理安排生产研发任务,遵守《中华人民共和国劳动法》确保员工每周至少休息 1 天,月加班不超过 36 小时,旺季提前排班避免临时突击加班;在逆变器焊接区、储能电池仓储区安装智能监测系统,实时监控温湿度、粉尘、噪声,超标自动报警并启动治理设备,每月公示数据接受监督;各办公区、生产基地设配沙发、饮水设备的员工休息区,新建基地规划带婴儿护理台的母婴室,夏季为生产车间发放防暑物资,冬季为电站现场调试等户外岗位提供防寒装备,保障员工舒适工作。

The company promises to provide a safe and comfortable working environment in line with industry characteristics, reasonably arrange production and R & D tasks, and abide by the Labor Law of the People's Republic of China to ensure that employees have at least one day off per week and the monthly overtime does not exceed 36 hours. In the peak season, schedules are arranged in advance to avoid sudden overtime. An intelligent monitoring system is installed in the inverter welding area and energy storage battery storage area to monitor temperature, humidity, dust and noise in real - time. When the standards are exceeded, it will automatically alarm and start the treatment equipment, and the data will be publicly announced monthly for supervision. Employee rest areas equipped with sofas and drinking water equipment are set up in each office area and production base. Maternity rooms with baby care tables are planned for new bases. In summer, heat - prevention supplies are distributed to production workshops, and in winter, cold - protection equipment is provided for outdoor positions such as on - site debugging at power stations to ensure employees work comfortably.

以 2023 年为基准年,至 2030 年员工月均加班时长≤36 小时,违规加班投诉率 0;温湿度、粉尘、噪声达标率≥98%;休息区、母婴室等福利设施覆盖率 100%,员工工作环境满意度≥90%。

Taking 2023 as the base year, by 2030, the average monthly overtime hours of employees should be  $\leq$  36 hours, and the complaint rate for illegal overtime should be 0; the compliance rates of



temperature, humidity, dust, and noise should be  $\geq$  98%; the coverage rates of welfare facilities such as rest areas and nursing rooms should be 100%, and the satisfaction rate of employees with the working environment should be  $\geq$  90%.

### 晋升与发展

### **Promotion and Development**

公司承诺搭建公平透明的职业发展平台,匹配新能源业务需求建立 "管理 + 技术" 双通道晋升体系,管理通道含部门主管、项目经理,技术通道含光伏逆变器研发工程师、储能系统专家,双通道可横向流转;制定《员工培训发展计划》,为研发岗开逆变器前沿技术、储能优化课程,生产岗开精益生产、设备运维课程,销售岗开海外合规、新能源解决方案课程,每年投入不低于员工工资总额 2% 的培训经费,支持考取光伏系统设计师等证书;设立 "合理化建议机制",鼓励员工提出逆变器生产效率提升、研发实验室节能等建议,采纳后按《合理化建议管理办法》给予奖励,优秀案例纳入知识库推广。年度目标( 2023 年为基准年,至 2030 年双通道晋升体系覆盖 100% 核心岗位,年度岗位竞聘参与率≥80%;员工培训覆盖率 100%,员工职业发展满意度≥85%。

The company promises to build a fair and transparent career development platform and establish a "management + technology" dual-channel promotion system to meet the needs of the new energy business. The management channel includes department heads and project managers, while the technology channel includes photovoltaic inverter R & D engineers and energy storage system experts. The two channels allow for horizontal transfer. It formulates the "Employee Training and Development Plan", offering courses on cutting - edge inverter technology and energy storage optimization for R & D positions, courses on lean production and equipment operation and maintenance for production positions, and courses on overseas compliance and new energy solutions for sales positions. It invests no less than 2% of the total employee salary in training expenses each year to support employees in obtaining certificates such as photovoltaic system designer. It sets up a "rationalization suggestion mechanism" to encourage employees to put forward suggestions on improving inverter production efficiency and energy-saving in R & D laboratories. After the suggestions are adopted, rewards will be given according to the "Management Measures for Rationalization Suggestions", and excellent cases will be included in the knowledge base for promotion.

Annual goals (with 2023 as the base year): By 2030, the dual - channel promotion system will cover 100% of core positions, and the annual participation rate in job competitions will be  $\geq$  80%. The employee training coverage rate will reach 100%, and employee satisfaction with career development will be  $\geq$  85%.



#### 禁止雇佣童工

### Child labor employment is prohibited.

公司承诺严格执行 "童工零容忍" 政策,人力资源部招聘时通过 "身份证核验 + 学信网 / 户籍验证" 确保录用者满 16 周岁,生产车间临时工、研发实验室辅助岗等参加二次复核;面向员工及社区开展 "反对童工" 宣传,在官网、供应商门户公布举报渠道(与商业道德举报共用),违规供应商立即终止合作并纳入 "供应链合规黑名单"。

The company promises to strictly implement the "zero tolerance for child labor" policy. When recruiting, the Human Resources Department uses "ID verification + academic credential verification on the China Higher Education Student Information Network/household registration verification" to ensure that the recruits are over 16 years old. Temporary workers in the production workshop and auxiliary staff in the R & D laboratory will undergo a second review. The company conducts "opposing child labor" publicity among employees and the community, and publishes the reporting channels (shared with the business ethics reporting channel) on the official website and the supplier portal. Suppliers who violate the policy will immediately have their cooperation terminated and be included in the "supply chain compliance blacklist".

以 2023 年为基准年,至 2030 年招聘环节年龄核查率 100%,年度童工雇佣事件 0 起;供应商用工年龄合规率 100%。

Taking 2023 as the base year, by 2030, the age verification rate in the recruitment process will reach 100%, and the number of annual child labor employment incidents will be zero; The compliance rate of the suppliers' employment age is 100%.

## 禁止强迫劳动

## Forced labor is prohibited.

公司承诺保障员工劳动自由与尊严,劳动合同明确约定工作内容、工时、薪酬等条款,禁止任何形式的押金或证件扣留。实行 "自愿加班" 原则,加班需提前申请并审批,加班费按法定标准支付。定期开展员工访谈,调查是否存在强迫劳动迹象,纳入管理层考核指标。

The company promises to safeguard the labor freedom and dignity of employees. The labor contract clearly stipulates terms such as work content, working hours, and compensation, and prohibits any form of deposit or certificate retention. The principle of "voluntary overtime" is implemented.

Overtime work requires prior application and approval, and overtime pay is paid according to legal standards. Regular employee interviews are conducted to investigate whether there are signs of forced labor, which are included in the assessment indicators for management.

以 2023 年为基准年,至 2030 年劳动合同规范签订率 100%,证件扣押投诉 0 起,年度强迫劳动事件 0 起。



Taking 2023 as the base year, by 2030, the standardized signing rate of labor contracts will reach 100%, the number of complaints about certificate seizure will be zero, and the number of annual forced labor incidents will be zero.

### 反歧视与反骚扰

#### **Anti-discrimination and Anti-harassment**

由于固德威集团在整个组织中采用了多元化和包容性做法,我们承诺,将多元化和包容性文化纳入我们的公司治理原则,该做法已在整个公司中得到积极部署。此外,招聘、留用、奖励和认可、晋升和退休等程序也在培养企业文化的包容性。每一位潜在员工都可以纯粹基于他们的能力和经验受雇于固德威集团的管理层和董事会的任何职位;而年龄、性别、性取向、种族、民族、国籍、原籍国、文化背景和残疾在招聘过程中从未被考虑在内。在就业至退休期间,我们平等地为所有员工提供专业发展计划,无论他们的性别、残疾或种族和民族;我们认为,每个人都应该有机会在没有任何歧视的情况下发展。此外,如果任何员工因个人或健康问题要求休假或改变工作条件,固德威集团始终在合理和必要的基础上提供此类灵活性,在审查过程中不包含性别、种族或文化偏见。

As GoodWe Group has adopted diversity and inclusion practices across the organization, we are committed to integrating a culture of diversity and inclusion into our corporate governance principles, and these practices have been actively implemented throughout the company. In addition, processes such as recruitment, retention, rewards and recognition, promotion, and retirement also contribute to cultivating an inclusive corporate culture. Every potential employee can be hired for any position on GoodWe Group's management and board purely based on their abilities and experience; age, gender, sexual orientation, race, ethnicity, nationality, country of origin, cultural background, and disability are never considered during the recruitment process. From employment to retirement, we provide professional development programs equally to all employees, regardless of their gender, disability, race, or ethnicity; we believe that everyone should have the opportunity to develop without any discrimination. Moreover, if any employee requests leave or a change in working conditions due to personal or health issues, GoodWe Group always provides such flexibility on a reasonable and necessary basis, and the review process is free from gender, racial, or cultural biases.

以 2023 年为基准年,至 2030 年招聘信息无歧视条款率 100%,录用决策合规率 100%;反专项培训覆盖率 100%、考核合格率 100%,年度歧视/骚扰事件 0 起。

Taking 2023 as the base year, by 2030, the rate of recruitment information without discriminatory clauses will reach 100%, and the compliance rate of employment decisions will reach 100%. The coverage rate of anti-discrimination special training will reach 100%, and the passing rate of the assessment will reach 100%. There will be zero discrimination/harassment incidents annually.



### 结社自由

#### Freedom of association

公司承诺尊重员工自由结社的权利,员工有权依法组织、加入或不加入工会及其他合法的员工组织;公司不得干涉员工自由结社的行为,不得因员工参与或不参与员工组织而对其进行歧视或报复。

The company promises to respect employees' right to freedom of association. Employees have the right to organize, join or not join trade unions and other legal employee organizations in accordance with the law. The company shall not interfere with employees' acts of freedom of association, nor discriminate against or retaliate against employees for their participation or non - participation in employee organizations.

为员工组织的活动提供必要的支持与便利,如提供活动场地、时间等;积极与员工组织沟通协商,就员工关心的劳动权益、工作条件等问题进行交流,认真听取员工组织的意见与建议,在 5 个工作日内对合理建议给予答复,并在合理期限内落实改进措施。

Provide necessary support and convenience for employee organizations' activities, such as providing activity venues and time; actively communicate and negotiate with employee organizations, exchange views on issues that employees are concerned about, including labor rights and working conditions, etc., earnestly listen to the opinions and suggestions of employee organizations, respond to reasonable suggestions within 5 working days, and implement improvement measures within a reasonable time frame.

以 2023 年为基准年,至 2030 年确保每年集体合同签署率,员工对自由结社权利知晓率达到 100%。 每年与员工组织开展至少 4 次有效沟通会议,员工组织提出的合理建议采纳率达到 80% 以上。

Taking 2023 as the base year, ensure that the signing rate of collective contracts and the awareness rate of employees about the right to freedom of association reach 100% every year until 2030. Conduct at least 4 effective communication meetings with employee organizations every year, and the adoption rate of reasonable suggestions put forward by employee organizations should reach over 80%.

## 政策更新与审查机制

# **Policy Update and Review Mechanism**

人力资源部牵头,每年第四季度对政策执行情况进行全面评估,报管理层审议后向董事会汇报。以3年为一个周期,由人力资源部联合法务部,结合国家法规更新、国际合规要求变化、行业实践发展及公司战略调整,对政策进行全面修订与完善,修订方案需经董事会审批后生效。

The Human Resources Department takes the lead to conduct a comprehensive assessment of the policy implementation situation every fourth quarter, report it to the management for review and then present it to the board of directors. With a three - year cycle, the Human Resources Department,



in conjunction with the Legal Department, will comprehensively revise and improve the policy in light of the updates of national regulations, changes in international compliance requirements, development of industry practices and strategic adjustments of the company. The revised plan shall come into effect after being approved by the board of directors.

出现以下情形之一时,应启动政策紧急更新程序:

The policy emergency update procedure shall be initiated when one of the following situations occurs:

相关国家法律法规或国际合规要求发生重大变化;

There are significant changes in relevant national laws and regulations or international compliance requirements.

供应链发生重大社会责任事件;

A major social responsibility incident has occurred in the supply chain.

发生重大人权风险事件,暴露政策漏洞;

The occurrence of major human rights risk events has exposed policy loopholes.

董事会提出政策修订要求。

The board of directors has put forward requirements for policy revisions.

紧急更新流程应在相关触发事件发生后30个工作日内完成评估,90个工作日内形成修订方案并报批。

The emergency update process should be evaluated within 30 working days after the occurrence of relevant triggering events, and a revised plan should be formulated and submitted for approval within 90 working days.

政策发布或更新后, ESG 管理部门需在 30 个工作日内组织内部采购相关部门及核心供应商开展宣贯培训,确保相关方充分理解政策要求。培训材料及记录需归档留存。

After the policy is issued or updated, the ESG management department shall organize internal procurement-related departments and core suppliers to conduct publicity and training within 30 working days to ensure that relevant parties fully understand the policy requirements. Training materials and records shall be filed and retained.

# 申诉举报机制

# Appeal and reporting mechanism

为保障公司人权政策等各项管理制度的有效执行,鼓励员工、供应商及利益相关方对违规行为进行监督;对日常工作活动中违反本政策的行为举报,包括但不限于:

To ensure the effective implementation of the company's various management systems such as the human rights policy, employees, suppliers and stakeholders are encouraged to supervise violations; report any behavior that violates this policy in daily work activities, including but not limited to:



员工因拒违规操作遭报复调岗降薪;高风险岗位未获合规防护致健康受损;合法薪酬被拖欠克扣。

Employees were retaliated against with job transfers and salary cuts for refusing to conduct illegal operations; employees in high-risk positions suffered health damage due to the lack of compliant protection; and employees' legal salaries were withheld or deducted.

供应商存在强制加班、欠薪、雇童工或违规排污,海外合作工厂有歧视用工、限制人身自由,且相关问题未处理。

The supplier engages in forced overtime, wage arrears, employs child labor, or discharges pollutants illegally. The overseas partner factories practice discriminatory employment and restrict personal freedom, and the relevant issues remain unresolved.

人权政策执行中徇私舞弊; 供应商人权审核、员工申诉处理中故意刁难。

Engage in malpractice for personal gain in the implementation of human rights policies; deliberately make things difficult in the human rights audits of suppliers and the handling of employee complaints.

公司设立多元化、保密的申诉举报渠道,相关信息在公司官网、供应商门户及办公区域显著位置公布:
The company has established diversified and confidential complaint and reporting channels, and relevant information is announced on the company's official website, supplier portal, and prominent locations in the office area.

申诉举报专用邮箱: GOODWE-Inform@goodwe.com

Dedicated email for complaints and reports: GOODWE-Inform@goodwe.com

申诉举报专用电话: 0512-62396791

Dedicated hotline for complaints and reports: 0512-62396791

公司严禁对申诉举报人进行打击报复,对因申诉举报受到不公平对待的相关方,经核实后将依法依规予以纠正,并对相关责任人进行严肃处理。

The company strictly prohibits retaliation against complainants and whistleblowers. For relevant parties who have been unfairly treated due to complaints or whistleblowing, after verification, corrections will be made in accordance with laws and regulations, and relevant responsible persons will be seriously dealt with.

## 补救程序

# **Remedial procedure**

当通过申诉机制确认违规事件属实后,人力资源部须立即与受害者沟通,充分听取受害者意见,共同商议并启动补救程序;补救程序旨在缓和事件影响、弥补受害者损失,不取代或干预司法程序。

Once the violation incident is confirmed to be true through the appeal mechanism, the Human Resources Department must immediately communicate with the victim, fully listen to the victim's



opinions, jointly discuss and initiate the remediation process. The remediation process aims to mitigate the impact of the incident and compensate for the victim's losses, and does not replace or interfere with the judicial process.

#### 补救措施核心要求

#### **Core requirements for remediation measures**

相称性:根据事件严重程度、对受害者造成的影响及违规行为性质,确定适当的补救措施,具体包括但不限于:

Proportionality: Determine appropriate remediation measures based on the severity of the incident, the impact on the victim, and the nature of the violation. Specific measures include but are not limited to:

- 由违规者或公司管理层向受害者进行正式书面或口头道歉;
- A formal written or oral apology to the victim from the violator or the company's management.
- 恢复受害者因事件失去的培训、晋升机会或其他应得利益(如绩效奖金、荣誉表彰);
- Restoration of training, promotion opportunities, or other due benefits (such as performance bonuses and honorary recognitions) lost by the victim due to the incident.
- 调整工作安排(如将受害者与违规者物理隔离、根据受害者意愿调动至其他岗位或部门);
- Adjustment of work arrangements (such as physically separating the victim from the violator, or transferring the victim to another position or department according to the victim's wishes).
- 为受害者提供带薪休假,支持其身心康复;
- Provision of paid leave to the victim to support their physical and mental recovery.
- 报销受害者因事件产生的心理咨询、医疗咨询等相关费用。
- Reimbursement of the victim's relevant expenses for psychological counseling, medical consultation, etc. incurred due to the incident.

透明度:人力资源部与受害者保持清晰、透明的沟通,及时告知调查结论、公司拟采取的补救措施及后续跟进计划;沟通过程中严格遵守保密原则,保护受害者、证人及相关人员的隐私,避免信息泄露导致二次伤害。 Transparency: The Human Resources Department should maintain clear and transparent communication with the victim, and promptly inform the victim of the investigation results, the company's proposed remediation measures, and the subsequent follow - up plan. During the communication process, strictly adhere to the confidentiality principle to protect the privacy of the victim, witnesses, and relevant personnel, and avoid secondary harm caused by information leakage. 监测有效性:补救措施实施后,人力资源部需定期(如1个月、3个月、6个月后)与受害者回访,监测补救措施的实际效果,确认受害者工作环境已恢复正常、未出现新的违规行为或报复行为;回访结果记录在案,用于评估并持续改进公司补救流程。



Monitoring effectiveness: After the implementation of the remediation measures, the Human Resources Department needs to conduct follow-up visits with the victim regularly (e.g., after 1 month, 3 months, and 6 months) to monitor the actual effect of the remediation measures, and confirm that the victim's work environment has returned to normal and no new violations or retaliatory actions have occurred. The results of the follow - up visits should be recorded for evaluating and continuously improving the company's remediation process.

#### 本政策经公司批准, 自 2023 年 9 月 7 日起生效。

This policy has been approved by the company and will come into effect on September 7, 2023.

黄敏

Min Huang

董事长兼总经理

Chairman of the Board of Directors and President

日期: 2023年9月6日

Date: 2023/9/6