To encourage supply chain partners to enhance their capacity to address climate change, ensure safe working environments, operate and produce in a responsible and ethical manner, and respect human rights and the environment, Huaqin Technology has developed the *Huaqin Technology Supplier Code of Conduct on Social Responsibility* (hereinafter referred to as "this Code") based on the following international standards and industry guidelines:

- UN Guiding Principles on Business and Human Rights (UNGP)
- ILO Core Conventions and the *Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy*
- OECD Guidelines for Multinational Enterprises
- Joint Audit Cooperation (JAC) Sustainability Guidelines
- UN Sustainable Development Goals (SDGs)

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CSR

The Code applies to all suppliers, including their subsidiaries, affiliates, subcontractors, and lower-tier suppliers (collectively referred to as “Suppliers”) that provide products and/or services to Huaqin Technology Co., Ltd. and/or its controlled subsidiaries, affiliates, or related parties. We require Suppliers to comply with the Code and all applicable laws and regulations in the countries and regions where they operate. With reasonable notice, we reserve the right to conduct on-site CSR audits at Suppliers’ facilities to assess

their compliance with the Code. Any violation of the Code, or unwillingness to cooperate with our audits, conflict minerals due diligence, or other related requirements, may affect the business relationship with Huaqin Technology and could lead to its termination.

Huaqin Technology encourages suppliers to engage in operations and production that adhere to requirements exceeding those outlined in this Code and all applicable laws and regulations, ensuring employees are treated with respect and dignity, environmental protection is prioritized, communities are benefited, and environmental and social sustainability is advanced.

workers, contract workers, direct employees and any other types A

Suppliers should effectively identify the age of all employees at the time of recruitment, and minors under the age of 18 should not be engaged in work that may endanger their health or safety, including

pay, and legally mandated benefits. Employees shall receive equal pay for equal work and qualifications. Suppliers shall pay wages in full and on time, providing employees with clear and understandable pay statements. Deduction of wages as a disciplinary measure is prohibited. Suppliers shall implement compensation system assessments and improvements, establish a reasonable wage growth mechanism, commit to progressively ensuring all workers achieve a living wage, and regularly evaluate the alignment between wage levels and local cost of living.

1.5

1.5 Humane Treatment

Suppliers shall not engage in any form of violence against employees, including but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse; nor shall they threaten to carry out any such acts. Relevant disciplinary measures, policies, and procedures must be clearly defined and effectively communicated to all employees.

1.6

1.6 Non-discrimination and Non-harassment

Suppliers shall not discriminate against or harass employees in any employment matters, including recruitment, promotion, rewards, training, and termination, based on race, skin color, age, gender,

sexual orientation, gender identity and gender expression, ethnicity or nationality, disability, pregnancy, religion, political affiliation, membership in associations, protected genetic information, or marital status. Suppliers shall not require employees or potential employees to undergo medical or physical examinations that could be used for discriminatory purposes. Appropriate facilities shall be provided for religious activities, and reasonable accommodations shall be made for employees with disabilities.

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Suppliers shall ensure that foreign workers enjoy the same legal rights and protections as local workers, including equal pay for equal work, reasonable working hours, and a safe working environment. Suppliers shall establish labor broker admission and due diligence procedures to ensure that the labor agencies they engage operate in compliance with applicable laws and do not charge workers any recruitment fees. Suppliers shall provide copies of employment contracts in a language understandable to foreign workers and clearly explain the terms of employment before their arrival at the workplace.

2.

2. Health and Safety

Suppliers shall provide a safe and hea9yhy working environment for the employees and ensure that the workplace is free from hazards that seriously endanger life or hea9yh.

2.1

2.1 Working Conditions

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Suppliers shall identify, assess, and control potential safety hazards

(such as chemical, electrical and other energy sources, fire, vehicle, and fall hazards) that employees may encounter. This shall be achieved through appropriate design, engineering and administrative controls, preventive maintenance, safe work procedures (including Lockout/Tagout), and ongoing safety training. Where hazards cannot be adequately controlled through such measures, suppliers shall provide workers with appropriate, well-maintained personal protective equipment (PPE) and related training. Suppliers must take appropriate measures to prevent pregnant or nursing women from exposure to high-risk working environments, and to eliminate or reduce any workplace health and safety risks they face. Appropriate facilities shall also be provided for nursing women.

2.2

2.2 Emergency Preparedness

Suppliers shall identify and assess potential emergency situations and incidents, including but not limited to fire, explosion, fatal accidents, and mass poisoning. They shall minimize their impact on human life, the environment, and property by implementing emergency plans and response procedures. These include emergency reporting, on-site first aid, notification and evacuation procedures, regular training and drills, and recovery plans.

2.3

2.3 Occupational Injury and Illness

Suppliers shall establish procedures and implement measures to prevent, manage, track, and report work-related injuries and occupational illnesses. This includes encouraging employees to report such incidents, classifying and recording cases of injury and illness, providing necessary treatment, investigating incidents to implement corrective actions that eliminate root causes, and employeeg ve

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Suppliers shall identify, assess, and control the potential impacts on employees from physically demanding tasks. Such tasks include manual material handling/loading and unloading, repetitive lifting of heavy objects, prolonged standing, and highly repetitive or high-intensity assembly work.

2.7

2.7 Machine Safeguarding

2.9 Health and Safety Communication

Suppliers shall provide employees with appropriate workplace health and safety information and training in a language employees use or understand. The content must cover all identified workplace hazards employees face, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Relevant health and safety information shall be clearly posted within the facility or placed in locations identifiable and accessible to workers. Suppliers must train employees before they begin work and provide regular training thereafter, and shall actively encourage employees to raise safety concerns.

3.

3. Environmental Protection

Suppliers shall minimize adverse impacts on the community, environment and natural resources while ensuring the health and safety of their employees.

3.1

3.1 Environmental Permits and Reporting

Suppliers shall obtain, maintain, and update all environmental permits

(such as emission monitoring), approvals, and registrations required by law, and shall adhere to the operational and reporting requirements specified therein.

3.2

3.2 Pollution Prevention

Suppliers shall comply with applicable laws and regulations related to pollutants (including solid waste, wastewater, exhaust gases, noise, etc.), covering all stages such as generation, transportation, storage, treatment, and discharge. They shall also actively seek methods to reduce or eliminate the generation and emission of pollutants. Additionally, they shall commit to conserving natural resources, including but not limited to water, fossil fuels, minerals, and forest products.

3.3

3.3 Hazardous Substances

Suppliers shall identify, label, and manage chemicals, waste, and other materials that may pose a hazard to humans or the environment, ensuring their safe handling, transfer, storage, use, recycling or reuse, and disposal. Suppliers shall also track and document data related to the disposal of hazardous substances.

3.4

3.4 Solid Waste

Suppliers shall identify, manage, reduce, and responsibly dispose of or recycle solid waste. Suppliers should track and record solid waste data.

3.5

3.5 Air Emissions

Suppliers shall classify, routinely monitor, control, and treat volatile organic chemicals, aerosols, corrosive substances, particulate matter, ozone-depleting substances, and combustion by-products generated during production and operational processes before their release. Ozone-depleting substances shall be managed effectively in accordance with the *Montreal Protocol* and applicable regulations. Suppliers shall conduct regular monitoring of the operational status of their air emission control systems.

3.6

3.6 Noise Management

Suppliers shall identify, control, monitor and reduce the sources of noise generated by the facility equipment that affect the boundary noise levels.

3.7

3.7 Water Management

4.

4. Business Ethics

Suppliers shall adhere to the highest ethical standards in all business dealings and maintain a zero-tolerance policy toward violations of business ethics.

4.1

4.1 Integrity

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Suppliers may not engage in bribery or unethical conduct. Suppliers must follow the requirements of “no bribery, no gifts, no con "

misrepresentations regarding the conditions or practices within their supply chain.

4.3

4.3 Intellectual Property

Suppliers should respect intellectual property rights, transfer technology or know-how in a manner that protects intellectual property rights, and protect the information security of customers and suppliers.

4.4

4.4 Fair Business, Advertising and Competition

Suppliers shall adhere to fair business, advertising and competition standards and comply with all applicable laws.

4.5

4.5 Protection of Identity and Non-Retaliation

Unless prohibited by law, Suppliers should develop and implement plans to ensure that suppliers and employees who report problems are protected and kept confidential and anonymous. Suppliers shall establish a dedicated anti-retaliation mechanism (see Chapter 7 for details), clearly defining the criteria for identifying retaliatory acts and the corresponding disciplinary measures.

4.6

4.6 Privacy Protection

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Suppliers shall undertake to keep confidential the personal information of all persons with whom it does business, including suppliers, customers, consumers and employees. When collecting, storing, processing, transmitting and sharing personal information, the suppliers shall comply with the requirements of laws and regulations relating to privacy and information security.

4.7

4.7 Reporting

Suppliers shall, in accordance with [illegible] *Technology Anti-Corruption and Anti-Commercial Bribery Policy*, report **any conduct t34F3 3F402.2**

Suppliers shall develop and publish a social and environmental responsibility policy, with a commitment to comply with relevant laws and regulations, approved by the executive management and published in the local language or a language understood by the local staff in the workplace.

5.2

5.2 Management Duties and Responsibilities

Suppliers shall designate a corporate representative to be responsible for ensuring the implementation of the management system and related plans. Senior management shall periodically review the operational status of the management system.

5.3

5.3 Legal and Customer Requirements

Suppliers shall establish procedures to identify, monitor, and understand applicable laws and regulations, customer requirements, and the requirements of the Code.

5.4

5.4 Risk Assessment and Management

Suppliers shall establish procedures to identify legal compliance, environmental, health and safety, labor practice, and ethical risks related to their operations. They shall determine the relative

significance of each risk and implement appropriate procedures and substantive controls to mitigate identified risks and ensure compliance.

5.5

5.5 Continuous Improvement

Suppliers shall establish written performance objectives, indicators and implementation plans, and periodically evaluate the progress of the implementation of these objectives and plans.

5.6

5.6 Training

Suppliers shall develop training programs for management and employees to implement Huaqin Technology's policies, procedures, and improvement objectives, and to meet applicable legal and regulatory requirements; newly hired employees are required to attend core

Multilingual Accessibility

Information on all grievance channels (including operational guidance) must be posted in workers' native language or a language they can understand at prominent locations in the workplace (e.g., canteens, dormitories, and workshop bulletin boards). For factories with a concentration of foreign workers, at least Chinese and the primary language of the workers shall be provided.

5.8.3

Identified and Anonymous Protection

Suppliers shall accept both identified and anonymous grievances and treat them equally. Regardless of the method of grievance, suppliers shall maintain strict confidentiality for the complainant. Suppliers shall formulate an anti-retaliation policy that explicitly prohibits dismissal, salary reduction, job transfer, ostracism, or other adverse treatment of employees as a result of filing a grievance; violators shall be subject to severe penalties.

5.8.4

Processing Timelines

- 48
- 3
- 15

7 30

- 5

Suppliers shall establish a time-bound system for handling grievances:

- Acknowledgement of Receipt: Confirm receipt to the complainant within 48 hours of receiving the grievance (except for anonymous grievances).
- Initial Assessment: Complete classification and severity assessment of the grievance within 3 working days.
- Investigation and Resolution: General grievances shall be resolved within 15 working days; grievances involving serious violations (e.g., child labor, forced labor, serious safety hazards) shall trigger an emergency investigation within 7 working days, with a resolution conclusion issued within 30 working days.
- Result Feedback: Communicate the outcome to the complainant within 5 working days after completion of handling (including resolution measures and the appeals pathway if the complainant is not satisfied).

5.8.5

Tracking and Effectiveness Evaluation

CSR

Suppliers shall establish an electronic case register management system for grievances, recording the date of receipt, type, investigation process, resolution conclusion, and timeliness for each grievance. Suppliers shall conduct quarterly statistical analysis of grievance data and submit a quarterly grievance data summary report to Huaqin

Technology. Suppliers shall conduct an employee grievance satisfaction survey at least annually and incorporate the findings into CSR management reviews.

5.8.6

Worker Participation

Worker Grievance Committee

Suppliers shall establish a Worker Grievance Committee, with representatives directly elected by workers participating in the design, operational oversight, and improvement discussions of the grievance mechanism. The Committee shall convene at least once per quarter to review grievance data and trend analysis reports.

5.9

5.9 Self-Assessments and Audits

CSR

CAP

Suppliers shall conduct regular self-assessments and internal audits to ensure compliance with applicable laws and regulations, as well as th41.92 D82ial responsibility-related requirements set forth in this Code and the quality agreement. Suppliers shall conduct a comprehensive CSR self-

improvement by the upstream supplier.

6.1

6.1 Company Commitment

Suppliers shall develop and publish a social and environmental responsibility policy, with a commitment to comply with relevant laws and regulations, approved by the executive management and published in the local language or a language understood by the local staff in the workplace.

6.2

6.2 Material Restriction

RoHS REACH /

Suppliers shall comply with all applicable laws, regulations, and customer requirements concerning prohibited or restricted substances, such as RoHS and REACH, and shall take effective measures to prohibit or restrict the use of specific substances in products and/or manufacturing processes.

6.3

6.3 Responsible Sourcing of Minerals

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Suppliers shall establish policies to reasonably ensure that metals such as tantalum, tin, tungsten, gold, and cobalt in the products they

manufacture do not directly or indirectly finance or benefit armed groups that commit human rights abuses in the Democratic Republic of the Congo or adjoining countries. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and shall provide their due diligence measures to customers upon request.

6.4

Improvement	Regularly evaluate the effectiveness of the grievance mechanism and continuously optimize its design based on feedback and data analysis.

7.2

7.2 Grievance Channel Standards for Supplier Workers

Huaqin Technology requires all suppliers to establish and maintain a worker grievance mechanism at their operational sites that meets the following standards, and to accept periodic audits by Huaqin Technology and third parties.

7.2.1

Multi-Channel Construction Requirements

Each supplier factory shall establish at least the following four types of grievance channels:

(a) 200 1 HR

(a) Physical channels: Install locked suggestion boxes in non-monitored areas, with a minimum of one box per 200 workers; provide paper grievance forms for easy access at any time. Suggestion boxes shall be opened jointly by worker representatives and HR at least once per week.

(b)

(b) Telephone channels: Establish a dedicated grievance hotline, ensuring dedicated personnel are available to answer calls during working hours; support voice messages or transfer to a third-party managed hotline during non-working hours.

(c) / WhatsApp

(c) Digital channels: Provide a dedicated grievance email, enterprise WeChat/WeChat official account, or WhatsApp reporting portal, supporting text, voice, and image uploads.

(d) HR

(d) Face-to-face channels: Factory HR or worker relations officers conduct regular rounds in workshops and canteens; establish a Worker Grievance Committee, enabling workers to directly raise issues with committee members.

7.2.2

7.2.2 Information Disclosure Requirements

Suppliers must post grievance channel information (including complete operational guidance) in all languages that workers can understand at the following locations:

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- Main factory entrance
- Each production workshop
- Employee canteen
- Employee dormitory bulletin boards
- New employee onboarding training materials (must include a grievance channel training module)

The posted content shall at least include: how to use each type of grievance channel, scope of acceptance, processing timelines, anti-retaliation policy statement, and notification of complainants' rights.

7.2.3 Scope of Grievance Acceptance

procedure. Reports involving forced labor, child labor, or serious safety hazards shall be automatically classified as "critical" and trigger an emergency investigation procedure.

7.4.3

Investigation Implementation

Severity Level	Investigation Launch Timeline	Investigation Method	Resolution Timeline
General	5 Within 5 working days	Document review, remote telephone interviews	10 10 working days
Serious	3 Within 3 working days	On-site investigation (including unannounced audits)	30 30 working days
Critical	24 Within 24 hours	Emergency on-site investigation ESG Notify Huaqin Technology ESG Executive Committee and procurement management	15 15 working days

7.4.4

Resolution and Feedback

CSR 5

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Upon completion of the investigation, the Huaqin Technology CSR team shall issue an investigation conclusion and proposed remedial actions, and provide feedback to the reporter within 5 working days (except where anonymous reports cannot be responded to). Remedial actions may include, but are not limited to: requiring the supplier to rectify within a specified timeframe (including a corrective and preventive action plan), imposing fines or penalty points on the supplier, suspending new business engagements,

7.5.1

Clear Definition of Retaliation

reporters who have experienced retaliation.

• 30 90 180

• Regular follow-up with reporters (on the 30th, 90th, and 180th day after case closure) to confirm that they have not suffered any form of retaliation.

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• Legal support shall be provided to reporters, including assistance in contacting legal aid organizations.

7.5.3

Supplier Anti-Retaliation Responsibilities

Suppliers must: formulate and publicly post an anti-retaliation policy, provide anti-retaliation training to all employees (incorporated as a mandatory module in new employee onboarding training), take serious disciplinary action against managers who engage in retaliation (up to and including dismissal), and cooperate with Huaqin Technology's investigation of retaliation reports.

7.6

7.6 Tracking, Monitoring & Effectiveness Evaluation

7.6.1

Grievance Data Management System

Case Management System

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CAP

Huaqin Technology establishes and maintains a unified Case Management

System, recording the full lifecycle data of each grievance, including: case reference number, date of receipt, channel source, reporter type (Huaqin employee/supplier worker/third party), report category, severity level, investigation process, resolution conclusion, CAP plan and completion status, and timeliness compliance.

7.6.2 KPI

Key Performance Indicators (KPIs) for the Grievance Mechanism

KPI

Huaqin Technology establishes the following KPIs for the grievance mechanism, with annual statistics and reviews:

KPI Indicator	Description	Target
Acknowledgement Timeliness Compliance Rate	48 Proportion of cases acknowledged within 48 hours	**≥ 95%**
Investigation Resolution Timeliness Compliance Rate	Proportion of grievances resolved within the specified timeframe	**≥ 90%**
CAP CAP On-Time Closure Rate	Ŭ	

improvement plan shall be publicly disclosed.

7.7

7.7 Worker Participation and Continuous Improvement

7.7.1

Worker Grievance Committee

Worker Grievance Committee, WGC WGC

WGC

Huaqin Technology encourages and requires all suppliers to establish a Worker Grievance Committee (WGC). The WGC shall be directly elected by workers (not designated by management), and its members shall cover worker representatives from different workshops, shifts, and employment types. The WGC participates in the day-to-day operational oversight of the grievance mechanism, regularly reviews anonymized grievance data reports, and negotiates with management on common or systemic issues for improvement.

7.7.2

Continuous Improvement Mechanism

WGC MSCI ESG

Huaqin Technology shall continuously improve the grievance mechanism based on the following information sources: trends and patterns identified through grievance data analysis, worker surveys and WGC feedback, and feedback from ESG rating agencies such as MSCI.

8.

8. Transparency and Information Disclosure

8.1

8.1 Supplier Audit Information Disclosure

ESG /

Huaqin Technology commits to publicly disclosing the following annually in its ESG report / sustainability report:

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• Total number of annual supplier audits (including periodic audits and unannounced audits)

• Audit coverage rate (number of audited suppliers as a proportion of total active suppliers)

• Distribution of major non-conformity types identified in audits (e.g., wages and working hours, health and safety, environmental emissions, etc.)

• Completion rate and timeliness of supplier corrective actions

• Number of suppliers suspended or terminated due to serious violations

8.2

8.2 Conflict Minerals Due Diligence Disclosure

3TG

/ RMI RMAP

Huaqin Technology commits to publicly disclosing conflict minerals due diligence results annually, including: country-of-origin distribution of 3TG (tin, tantalum, tungsten, gold) and cobalt in the supply chain, compliance status of smelters/refineries (proportion certified through RMI RMAP compliance), and non-conformities identified during the due

diligence process and corresponding corrective actions.

8.3

8.3 Greenhouse Gas Emissions and Carbon Target Disclosure

Huaqin Technology requires suppliers to publicly disclose their greenhouse gas emission data (Scope 1 and Scope 2 updated at least annually) and progress toward emission reduction targets. Huaqin Technology itself commits to annually disclosing Scope 1, Scope 2, and material categories of Scope 3 emission data, as well as progress toward achieving carbon reduction targets.

8.4

8.4 Data Quality Assurance

ESG

Huaqin Technology commits to conducting internal review and external assurance of disclosed ESG data (at least limited assurance for key data), and to continuously improving the completeness and accuracy of data collection, statistical analysis, and disclosure.

Huaqin Technology Co., Ltd.

2026 7 31

31 July 2026

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