



**China Hongqiao Group Limited**

**中国宏桥集团有限公司**

*(Incorporated in the Cayman Islands with limited liability)*

*(the “Company”)*

*(Stock Code: 1378)*

## **HUMAN RIGHTS POLICY AND ANTI-TRAFFICKING STATEMENT (Revised)**

**(Adopted by the Sustainability Committee of the Company on 24 April 2026)**

### **I. Core Concepts and Objectives**

China Hongqiao Group Limited (hereinafter referred to as "China Hongqiao" or "the Group") is committed to respecting and protecting human rights in global operations, integrating human rights concepts into strategic decision-making and daily operations. We are committed to assuming social responsibilities by ensuring that the rights of employees, suppliers, communities and other stakeholders are protected from any negative impact of our business activities. We strive to create an inclusive, mutually supportive, fair, safe, healthy, harmonious and non-discriminatory working environment for all employees.

### **II. Values and International Standards**

China Hongqiao upholds the value of "Building Businesses for the Nation, Bringing Prosperity to the People" and adheres to the following internationally recognised human rights principles:

- The United Nations *Universal Declaration of Human Rights*;
- The United Nations *International Convention on the Elimination of All Forms of Racial Discrimination*;
- The United Nations Global Compact principles in the four areas of human rights, labour, environment and anti-corruption;
- The United Nations *Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery*;
- The UN Human Rights Council *United Nations Guiding Principles on Business and Human Rights* (UNGPs);

- The Eight Fundamental Conventions of the International Labour Organisation (ILO), covering the prohibition of forced labour and child labour, as well as the protection of freedom of association and equal employment opportunities;
- Organisation for Economic Co-operation and Development (OECD) *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (3rd Edition).

### **III. Scope of Application**

This policy applies to all employees of China Hongqiao Group and its subsidiaries/branches (full-time employees, part-time employees, interns, and dispatched workers, including board members and senior management), covering all aspects of the entire value chain, including research and development (R&D), procurement, production, operations, sales, and services. Meanwhile, the Group also advocates for and promotes value chain partners (including suppliers, contractors, customers, etc.) to jointly adhere to the principles of this policy.

### **IV. Commitments and Actions**

The Group solemnly commits to respecting and protecting human rights, strictly complying with the laws and regulations of the countries or regions where it operates as well as relevant internationally recognised standards, adopting a zero-tolerance approach towards misconduct such as human trafficking, slavery, child labour, forced labour, discrimination and harassment, and taking measures to avoid, reduce or eliminate, to the greatest extent possible, the negative impacts of its business activities on individuals, employees and communities, and striving to fulfil its corporate social responsibilities.

#### **1. Diversity, Equality and Inclusion**

The Group is committed to ensuring that all employees are treated with equal dignity and respect, and is dedicated to creating a diverse, equal and inclusive working environment for employees. The Group prohibits any form of discrimination in employment practices such as recruitment, remuneration, promotion, training or dismissal, including discrimination based on gender, race, religion, age, nationality, disability, marital status, childbearing status, physical condition and cultural background, ensuring equal opportunities.

#### **2. Prohibition of Human Trafficking, Child Labour and Forced Labour**

The Group prohibits any form of human trafficking, slavery, child labour, forced labour and other such acts, protects the rights and interests of minors and women, and ensures that all work is based on the principles of voluntariness, fairness and legality. The Group will continuously improve relevant rules and regulations and carry out ongoing monitoring of their implementation to ensure that modern slavery does not occur within its operations, and that

any individuals or entities doing business with the Group do not benefit from or contribute to modern slavery in any form.

### **3. Anti-Harassment and Anti-Violence**

The Group prohibits any words, acts or behaviours that violate human dignity, integrity and freedom, including but not limited to insults, bullying, intimidation, threat, corporal punishment, defamation, harassment (including sexual and non-sexual harassment), mental or physical coercion, etc. Security personnel of the Group or third-party security personnel serving the Group shall not use violence, conduct unlawful body searches or cross-gender body searches, nor threaten to carry out such acts. The Group commits not to use minerals from conflict-affected and high-risk areas, and not to contribute to armed conflict or human rights abuses.

### **4. Freedom of Association and Collective Bargaining**

The Group respects employees' rights to freedom of association and collective bargaining, and ensures that employees have the rights to freely form, join and withdraw from labour unions and other organisations, express their opinions and be represented. The Group commits to engaging in sincere consultation and communication with employee representatives and trade union representatives, and extensively soliciting employees' opinions and feedback. In the event that significant operational changes or other matters that may have a negative impact on employees occur, the Group will notify the labour union or all employees in advance and implement corresponding plans in accordance with relevant laws and regulations, minimising the negative impact on employees to the greatest extent possible.

### **5. Working Conditions**

The Group complies with applicable laws, regulations and requirements relating to working hours, rest and leave, wages and benefits, social insurance, and occupational safety and health, providing employees with lawful and fair working conditions as well as a healthy and safe workplace. The Group strives to protect employees' right to receive wages and remuneration (including overtime pay and annual leave pay) in accordance with the law, ensure that wages are not lower than the legal or industry minimum wage standard and meet basic living needs, and implement equal pay for men and women for equal work; ensure that employees' normal working hours do not exceed the maximum statutory limit, strive to avoid or reduce overtime or excessive working hours, and provide employees with reasonable rest and leave and various welfare conditions; provide employees with diverse career development paths and equal promotion opportunities, organise professional training and learning exchanges, and help employees enhance their professional capabilities and realise their own value.

### **6. Indigenous and Community Rights**

The Group respects and safeguards the lawful rights and interests of residents and indigenous peoples. In compliance with the laws of the host country and with reference to international good practices, the Group will conduct social impact assessments, consider feasible alternatives, balance environmental, social and financial costs and benefits, strive to avoid or minimise the

displacement of indigenous peoples or community residents from their residences or property, and make every effort to prevent, mitigate and remedy adverse impacts on local communities, indigenous peoples and vulnerable groups in terms of land, livelihoods and resources throughout the project life cycle.

## **7. Human Rights Due Diligence**

The Group adheres to internationally recognised standards and integrates human rights due diligence into its business operations, identifying and assessing human rights risks and impacts, formulating and implementing corresponding management plans, and systematically managing human rights risks through measures such as prevention, mitigation during the process and post-impact remediation, so as to mitigate and strive to eliminate negative human rights impacts. The Group carries out continuous monitoring and regular reporting on human rights impacts and the effectiveness of response measures. The Group will engage in sincere dialogue, communication and consultation with employees, suppliers, communities and other stakeholders who have been or may be affected, in order to continuously improve its human rights impact management practices.

## **8. Human Rights Training and Communication**

The Group actively communicates this policy to employees and external stakeholders, publicises and promotes the concept of human rights protection, and organises human rights training covering content including but not limited to anti-discrimination, anti-harassment, anti-forced labour, grievance mechanisms, etc., so as to ensure that employees and external stakeholders fully understand and comply with the requirements of this policy, and encourages them to speak up on human rights issues.

## **9. Requirements for Business Partners**

The Group requires business partners such as suppliers and contractors to comply with internationally recognised human rights standards and the human rights protection requirements set out in this policy, the Supplier Code of Conduct, and other policies, and conducts ongoing monitoring of suppliers and contractors. The Group is also committed to collaborating with business partners to assist them in actively addressing human rights risks and challenges.

## **10. Grievance and Whistleblowing Mechanism**

The Group has established a sound grievance and whistleblowing mechanism, providing accessible, convenient and transparent channels for employees and external stakeholders, including but not limited to telephone, email, etc., to receive reports and feedback from employees and external stakeholders on any human rights issues or incidents. If employees experience misconduct such as discrimination or harassment, in addition to reporting or complaining through the Group's whistleblowing and grievance channels, they may also provide feedback directly to their immediate supervisor or department head in person or in writing; in cases involving sensitive incidents such as sexual harassment, female investigators may be assigned to handle and investigate the matter.

Upon receiving a grievance or complaint, the relevant responsible department of the Group will immediately initiate investigation procedures. For verified human rights violations such as discrimination, harassment, forced labour, etc., the Group will, in accordance with internal rules and regulations, impose disciplinary measures including but not limited to circulating a notice of criticism, warning, suspension or dismissal on the relevant responsible persons, and pursue their legal liability in accordance with the law. The Group will also actively take corresponding remedial measures to assist the victims and eliminate, to the extent possible, the negative impact on them. The Group protects the identity of whistleblowers and makes every effort to ensure that whistleblowers are not subject to retaliation for their complaints.

## **V. Supplementary Provisions**

### **1. Continuous Improvement**

The Group will, when necessary, revise this policy from time to time according to legal and regulatory changes, updates to industry standards and feedback from stakeholders, and publicly update the content through channels such as the official website, ESG reports/sustainability reports and other channels to ensure the continuous adaptability and effectiveness of the policy.

### **2. Approval Authority**

The policy is reviewed and approved by the Sustainability Committee under the Group's Board of Directors and shall come into force on the date of issuance.

### **3. Interpretation**

The policy shall be interpreted by China Hongqiao. The document is prepared in both Chinese and English. In case of any discrepancy between the Chinese and English versions, the Chinese version shall prevail.