

欣旺达人权政策

Sunwoda Electronic Co., Ltd.

Human Rights Policy

1.政策宗旨

1 Policy Purpose

欣旺达电子股份有限公司（以下简称“公司”）坚信，尊重和保护人权是企业可持续发展的基石。公司承诺在全部经营活动及全球业务中遵循国际公认的人权标准，包括《联合国工商企业与人权指导原则》（UNGPs）《国际劳工组织关于工作中基本原则和权利宣言》及《联合国全球契约》十项原则。公司致力于将人权理念融入公司战略、治理与日常运营及供应链管理全过程，以负责任的态度对待每一位员工、合作伙伴及社区成员。

Sunwoda Electronic Co., Ltd. (hereinafter referred to as "the Company") firmly believes that respecting and protecting human rights is the cornerstone for the sustainable development of enterprises. The Company pledges to follow internationally recognized human rights standards in all of its business activities and global operations, including the "United Nations Guiding Principles on Business and Human Rights" (UNGPs), the "ILO Declaration on Fundamental Principles and Rights at Work", and the ten principles of the "United Nations Global Compact". The Company is committed to integrating the concept of human rights into the entire process of its corporate strategy, governance, daily operations, and supply chain management, treating every employee, partner, and community member with a responsible attitude.

2.适用范围

2 Scope of Application

本政策适用于公司及旗下分、子公司的所有董事与员工（包括全职员工、兼职员工、劳务派遣员工等）及为本公司及旗下分、子公司提供服务或代工的外部承包商、外包公司及其员工、与本公司建立战略合作关系的供应商、技术合作方、联合运营伙伴等。

This policy applies to all directors and employees of the Company and its subsidiaries (including full-time employees, part-time employees, dispatched workers, etc.) as well as external contractors, outsourcing companies and their employees who provide services or undertake production tasks for the Company and its subsidiaries, suppliers establishing strategic partnerships with the Company, technical cooperation partners, and joint

operation partners, etc.

3.核心承诺

3 Core Commitment

公司公开承诺，在全公司范围内尊重所有人权，尤其着力预防、避免和减轻以下人权负面影响：

The Company has publicly committed to respecting all human rights throughout the entire organization, with a particular focus on preventing, avoiding and mitigating the following adverse impacts on human rights:

3.1 对自身运营的承诺

Commitment to Our Own Operations

- 禁止强迫劳动与人口贩运：禁止任何形式的强迫或强制劳动、抵押劳动、契约束缚及人口贩运。员工的雇佣必须是自愿的，行动自由不受无理限制，身份证明文件不得被扣押。

Prohibition of Forced Labor and Human Trafficking: Prohibition of all forms of forced or compulsory labor, bonded labor, indentured labor, and human trafficking. All employment must be voluntary, with freedom of movement not subject to unreasonable restrictions, and identity documents must not be withheld.

- 杜绝童工：绝不雇佣任何未满当地法定最低就业年龄或未完成义务教育年限的劳动者，并建立有效的年龄核验机制。

Elimination of Child Labor: The Company shall not employ any workers who are under the local minimum employment age or have not completed the required years of compulsory education, and establish an effective age verification mechanism.

- 尊重结社自由与集体谈判：尊重所有员工依法自由组建、加入自己选择的工会、进行集体谈判（特别是有关工作条款和工作环境）及参与和平集会的权利，不对相关活动进行干涉或报复。

Respect for Freedom of Association and Collective Bargaining: Respect the rights of all employees to freely form and join the unions of their choice, to engage in collective bargaining (particularly regarding working terms and working conditions), and to participate in peaceful assemblies. Do not interfere with or retaliate against such activities.

- 反对歧视，倡导多元与包容：致力于提供平等机会，禁止在招聘、薪酬、培训、晋升、解雇等任何雇佣环节，基于种族、肤色、性别、年龄、国籍、宗教、残疾、性取向、婚姻状况、工会归属、语言、政治观点、社会出身、财产、出生、健康状况、居住地、经济状况等任何理由的

歧视。公司将积极营造包容、无骚扰的工作环境，坚决反对任何形式的霸凌、骚扰与虐待，同时公司为联合国全球契约（UNGC）签署方，已承诺遵守 ILO 核心公约，包括结社自由、禁止强迫劳动、消除童工与反歧视等原则。

Anti-Discrimination, Diversity & Inclusion: We are committed to providing equal opportunities and prohibiting any form of discrimination in any aspect of employment, including recruitment, compensation, training, promotion, and dismissal. Such discrimination shall not be based on race, color, gender, age, nationality, religion, disability, sexual orientation, marital status, trade union affiliation, language, political views, social origin, property, birth, health condition, place of residence, economic status, or any other reason. The Company will actively create an inclusive and harassment-free working environment and firmly oppose any form of bullying, harassment, and abuse. At the same time, the Company is a signatory to the United Nations Global Compact (UNGC) and has committed to complying with the ILO Core Conventions, including freedom of association, prohibition of forced labor, elimination of child labor, and anti-discrimination principles.

- 提供安全工作环境：通过系统的风险管理，确保为所有人员（包括员工和承包商）提供符合安全卫生规定的工作环境，保证其在人身安全不受危害的环境条件下工作。

Provision of a Safe and Healthy Working Environment: Through systematic risk management, ensure that a working environment compliant with safety and health regulations is provided for all personnel (including employees and contractors), guaranteeing that they can work in an environment where their personal safety is not endangered.

- 保障公平劳动条件：遵守适用法律中关于工作时间和加班的规定，保障员工享有充足的休息。确保支付的薪酬不低于法定或行业最低标准，符合基本生活需要，并推行基于价值贡献的公平薪酬体系。

Fair Labor Conditions: Adhere to the regulations on working hours and overtime stipulated in applicable laws, guarantee that employees have sufficient rest. Ensure that the remuneration paid is not lower than the legal or industry minimum standards, meets the basic living needs, and implement a fair salary system based on value contribution.

3.2 对供应商的要求

Requirements for Suppliers

公司要求供应商及主要承包商至少遵守运营地法律，并鼓励其向本政策确立的国际标准看齐。公司将通过合同条款、行为准则、现场审核及能力建设等方式，推动供应链中的人权尽职调查，重点评估与应对强迫劳动、童工、职业安全、工时与薪酬等风险。对于严重或屡次违反人权承诺的供应商，我们将保留终止合作的权利。

The Company requires suppliers and major contractors to at least comply with the laws of the operating location and encourages them to align with the international standards established by this policy. The Company will promote human rights due diligence in the supply chain through contract terms, the Supplier Code of Conduct, on-site audits, and capacity building, with a focus on assessing and addressing risks such as forced labor, child labor, occupational safety, working hours and wages. For suppliers who seriously or repeatedly violate human rights commitments, we reserve the right to terminate the cooperation.

3.3 对合作伙伴的要求

Requirements for partners

在与合资企业、代理商、销售伙伴及项目合作方的业务关系中，公司将积极倡导人权保护理念，寻求建立共识，并在协议与日常管理中纳入相关期望，共同促进商业活动对人权的积极影响。

In its business relationships with joint ventures, agents, sales partners and project collaborators, the Company will actively advocate the concept of human rights protection, seek to establish consensus, and incorporate relevant expectations into agreements and daily management, jointly promoting the positive impact of business activities on human rights.

4.实施、尽责与治理

4 Implementation, Responsibility and Governance

- 治理架构：董事会层面的战略与可持续发展委员会负责监督本政策的实施。日常管理职责由可持续发展部门及相关职能部门承担，公司将为有效管理人权议题配置必要资源。

Governance structure: The Strategic and Sustainable Development Committee at the board level is responsible for supervising the implementation of this policy. The day-to-day management responsibilities are undertaken by the Sustainable Development

Department and relevant functional departments. The Company will allocate necessary resources to effectively manage human rights issues.

- 人权尽责：公司将建立并实施持续的人权尽责管理程序，包括定期识别、评估、预防和减缓实际与潜在的人权影响，并追踪应对措施的有效性。

Human Rights Due Diligence: The Company will establish and implement a continuous human rights due diligence management procedure, which includes regularly identifying, assessing, preventing and mitigating actual and potential human rights impacts, and tracking the effectiveness of the response measures.

- 培训与沟通：定期为管理层及相关岗位员工提供培训，确保其理解并有能力执行本政策。本政策将向所有员工及利益相关方清晰传达。

Training and Communication: Regularly provide training to the management and employees in relevant positions to ensure they understand and are capable of implementing this policy. This policy will be clearly communicated to all employees and stakeholders.

- 透明与问责：公司将通过年度可持续发展报告等渠道，定期公开披露在管理人权风险、处理申诉及达成目标方面的进展与挑战。

Transparency and Accountability: The Company will regularly disclose its progress and challenges in managing human rights risks, handling grievances and achieving goals through channels such as annual sustainability reports.

5.申诉与补救

5 Grievance and Remedies

公司建立并维护安全、保密、便捷且免于报复的申诉机制。任何员工或外部利益相关方，如认为其人权因公司业务活动受到侵害，或发现疑似违反本政策的行为，均可通过以下渠道提出：

The Company has established and maintained a safe, confidential, convenient and non-retaliatory grievance mechanism. Any employee or external stakeholder who believes that their human rights have been violated due to the Company's business activities, or discovers suspected violations of this policy, can submit their complaint through the following channels:

内部渠道：直接上级、人力资源部门、工会、内部合规热线/邮箱；

Internal channels: immediate supervisor, human resources department, trade union,

internal compliance hotline/email;

独立外部渠道：指定申诉邮箱（例如：er@sunwoda.com）。

Independent external channel: Designated appeal email address (for example: er@sunwoda.com).

公司承诺对所有申诉进行公正、及时处理，并在确认造成损害时，通过合法合规程序提供适当补救。

The Company guarantees to handle all complaints fairly and promptly, and when it is confirmed that damage has occurred, it will provide appropriate remedies through legal and compliant procedures.

6.政策审议

6 Policy Review

本政策经管理层批准后生效。公司承诺至少每三年或在法律法规、国际标准发生重大变化时，对本政策进行系统性评审与必要修订，以确保其持续有效性和领先性。

This policy will come into effect after being approved by the management. The Company pledges to conduct a systematic review and necessary revisions of this policy at least every three years or whenever significant changes occur in laws and regulations or international standards, in order to ensure its continuous effectiveness and leading edge.

本政策提供中英文两种版本，若内容上稍有细微出入，请以中文版为准。

This policy is issued in both Chinese and English versions. In the event of any minor discrepancy between the two language editions, the Chinese version shall prevail.

欣旺达电子股份有限公司
Sunwoda Electronic Co., Ltd.

2026 年 6 月

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