

华勤技术供应商社会责任行为准则

Huaqin Technology

Supplier Social Responsibility Code of Conduct

华勤技术股份有限公司（以下简称「华勤技术」或「公司」）是全球领先的智能产品平台型企业，秉承“改善人们沟通与生活”的使命，为全球科技品牌客户提供从产品研发到运营制造的端到端服务。产品、服务惠及全球 100+个国家和地区，为亿万消费者提供数以亿计的智能产品，包括智能手机、平板电脑、笔记本电脑、智能穿戴、AIoT、数据中心产品和汽车电子产品等。

Huaqin Technology Co., Ltd. (hereinafter "Huaqin Technology" or "the Company") is the world's leading intelligent product platform enterprise. Upholding the mission "Easier connecting, Better living", we provide global tech brands with end-to-end services from product development to operational manufacturing. Our products and services reach over 100 countries and regions worldwide, delivering hundreds of millions of intelligent products to customers. These include smartphones, tablets, laptops, smart wearables, AIoT devices, data center products, and automotive electronics.

为鼓励供应链合作伙伴提高应对气候变化能力，确保工作环境的安全、以负责任并合乎道德方式运营和生产，并尊重人权及环境，华勤技术基于以下国际标准和行业准则，制定了《华勤技术供应商社会责任行为准则》（以下简称「本准则」）：

- 联合国工商企业与人权指导原则（UNGP）
- 国际劳工组织（ILO）公约及《关于多国企业和社会政策的三方原则宣言》
- 经合组织（OECD）跨国企业指南
- 全球电信企业社会责任联盟（JAC）可持续发展指引
- 联合国可持续发展目标（SDGs）

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 (UNGPR)
- 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)

本准则适用于向华勤技术股份有限公司和/或其控股的子公司、关联公司或实际控制的关联方提供产品和/或服务的供应商及其子公司、关联公司，以及其所有分包商、供应商和其下多级供应商（统称“供应商”）。华勤技术要求供应商遵守本准则，并遵守其经营所在国与地区的法律和法规。在合理通知的情况下，华勤有权对供应商的现场进行 CSR 审核，以评估供应商对本准则遵守的情况。任何违反本准则，或不愿意配合华勤技术审核、冲突矿产尽职调查等的行为，均可能影响供应商与华勤技术之间的业务关系，甚至导致双方业务关系的终止。

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. 华勤技术鼓励供应商遵循高于本准则和所有适用法律法规的要求开展生产经营活动，让员工受到尊重，拥有尊严，注意环保，造福社区，推动环境与社会可持续发展。

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.

本准则包含八大模块：劳工人权、健康安全、环境保护、商业道德、管理体系、供应链管理、申诉与举报程序、透明度与信息披露。

The Code contains eight modules: labor, health and safety, environmental protection, business ethics, management systems, supply chain management, complaints and reporting procedures and transparency & information disclosure.

1. 劳工

1. Labor

供应商必须根据国际社会通行的准则维护员工的人权，充分尊重员工并维护其尊严。这适用于所有员工，包括临时工、外来务工者、学生工、合同工、直接雇员和任何其他类型的员工。

Suppliers must uphold the human rights of their employees and fully respect and uphold their dignity in accordance with the norms prevailing in the international community. This applies to all employees, including temporary workers, migrant workers, student

workers, contract workers, direct employees and any other types of employees.

1.1 自由择业

1.1 Prohibition of Forced Labor

供应商不得雇佣任何形式的强迫、抵押（包括抵债）或抵债劳工、监狱劳工、奴役人口或被贩卖人口，不得通过威胁、强迫、强制、诱拐或欺骗方式运送、窝藏、招聘、转移或接收此类劳工或服务。供应商不得限制员工人身自由，不得扣留身份证明文件，不得要求员工向雇主或代理支付押金、招聘费或其他费用。所有工作均须出于自愿，员工有权在任何时候自由离职或终止雇佣关系，而无需缴纳不合理罚金。

Suppliers must not employ any form of forced, bonded (including debt bondage), or indentured labor, prison labor, enslaved or trafficked persons. They shall not transport, harbor, recruit, transfer, or receive such labor or services through threats, coercion, compulsion, abduction, or deception. Suppliers must not restrict employees' freedom of movement, retain original identification documents, or require employees to pay deposits, recruitment fees, or any other fees to employers or agents. All work shall be performed voluntarily, and workers have the right to freely leave or terminate their employment relationship at any time without being subject to unreasonable penalties.

1.2 童工和未成年工

1.2 Child Labor and Young workers

供应商必须遵守所有适用的有关最低工作年龄的法律法规，禁止使用任何形式的童工。供应商应在招聘时有效鉴别所有员工的年龄，低于 18 周岁的未成年工不得从事可能危及其健康或安全的工作，包括夜班和加班。供应商应依法保护学生工和学徒工。

Suppliers must comply with all applicable laws and regulations relating to the minimum working age and prohibit any form of child labor.

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 night and overtime work. Suppliers shall protect student and apprentice workers in accordance with the law.

1.3 工作时间

1.3 Working Hours

供应商应遵守所有适用的与工作时间及休息相关的法律法规，所有加班必须自愿，正常工作和加班时间需有真实且详细记录。员工每周工作时间（含加班）不超过60小时，每连续工作六天至少休息一天。根据适用法律法规，向员工提供假期、休假福利及法定假日。

Suppliers shall comply with all applicable laws and regulations pertaining to working hours and rest. All overtime work must be voluntary, with real and detailed records of normal work and overtime hours. The weekly working hours (including overtime) of employees shall not exceed 60 hours, with at least one day off for every six consecutive working days. Employees are provided with holidays, vacation benefits and statutory holidays in accordance with applicable laws and regulations.

1.4 工资福利

1.4 Wages and Benefits

供应商支付给员工的工资必须符合所有适用的工资法律，包括与最低工资、加班工资和法定福利相关的法律。员工应获得平等工作与资格的同等薪酬。供应商应足额、按时发放工资并向员工本人提供清晰易懂的工资条。供应商不得以扣减工资作为纪律处罚手段。供应商应实施薪酬体系评估和完善，建立合理薪酬增长机制，承诺所有员工逐步达到体面生活工资（Living Wage），并定期评估工资水平与当地生活成本的匹配度。

Suppliers must ensure that all wages paid to employees comply with all applicable wage laws, including those related to minimum wage, overtime

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 人道待遇

1.5 Humane Treatment

供应商不得暴力对待员工，包括任何形式的性骚扰、性虐待、体罚、精神胁迫或身体胁迫或口头辱骂；亦不得威胁要进行任何此类行为。有关的纪律、政策及程序必须有清晰的定义，并向员工清晰传达。

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 反歧视及反骚扰

1.6 Non-discrimination and Non-harassment

供应商不得因人种、肤色、年龄、性别、性取向、性别认同和性别表现、种族或民族、残疾、怀孕、宗教信仰、政治派别、社团成员身份、受保护的基因信息或婚姻状况等在招聘和用工事务（如升迁、奖励、培训和解雇）中歧视或骚扰员工。不得要求员工或准员工接受可能带有歧视性目的的医学检查或身体检查。应为员工提供适当的场所进行宗教活动，并为残疾员工提供合理的设施。

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.

1.7 自由结社和集体谈判

1.7 Freedom of Association and Collective Bargaining

供应商应根据当地法律，尊重所有员工自愿组建和加入工会、进行集体谈判与和平集会以及拒绝参加此等活动的权利。供应商应建立有效的劳资沟通机制，定期与员工或员工代表沟通。员工和/或其代表应能与管理层就工作条件和管理实践公开交流沟通并表达看法和疑虑，而无需担心会受到歧视、报复、威胁或骚扰。

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

1.8 外籍劳工与劳务中介管理

1.8 Foreign Workers and Labor Broker Management

供应商应确保外籍劳工与本地员工享有同等的法定权益和保护，包括同工同酬、合理工时及安全工作环境。供应商应建立劳务中介准入和尽职调查程序，确保所使用的劳务中介机构依法合规运营，不向工人收取任何招聘费用。供应商应以外

籍劳工可以理解的语言提供雇佣合同副本，并在其抵达工作地前清晰说明雇佣条款。

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. 健康安全

2. Health and Safety

供应商应为员工提供安全和健康的工作环境，并确保工作场所无严重危及生命安全或健康的危险源。

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

2.1 工作条件

2.1 Working Conditions

供应商应通过适当的设计、工程技术和管理控制措施、预防性维护和安全工作流程（包括锁定/挂签）以及持续的安全培训，识别、评估和控制员工可能遇到的潜在安全隐患（如化学、电气和其他能源、火灾、车辆及坠落危险）。若无法通过上述方法有效控制隐患，应为工人提供适当的、保养良好的个人防护装备以及相关培训。供应商必须采取适当的措施，避免让孕妇/哺乳期妇女接触高危工作环境，消除或降低其在工作场所健康与安全上所面临的任何风险，同时为哺乳期妇女提供适当的设施。

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 应急准备

2.2 Emergency Preparedness

供应商应识别并评估可能发生的紧急情况 and 事件, 包括但不限于火灾、爆炸、致命事故、集体中毒等, 并通过实施应急方案及应对程序, 包括: 紧急报告、现场急救、通知和撤离程序、定期训练与演习和恢复计划等, 最大程度地降低对人身、环境和财产的影响。

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 工伤和职业病

2.3 Occupational Injury and Illness

供应商应制定程序并采取相关措施, 以预防、管理、跟踪和报告工伤和职业病, 包括鼓励员工报告、归类和记录工伤和疾病案例、提供必要的治疗、调查工伤并

采取纠正行动以消除原因和协助员工返回工作岗位。

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 assisting employees in returning to work.

2.4 传染病准备和应对

2.4 Infectious Disease Preparedness and Response

供应商应制定并实施具有合理步骤的计划，准备、防范和应对员工中可能出现的传染病情形。

Suppliers shall establish and implement a plan with reasonable steps to prepare for, prevent, and respond to potential infectious disease situations among employees.

2.5 职业卫生

2.5 Occupational Health

供应商应当识别、评估并控制员工可能面临的化学、生物及物理暴露风险。应通过适当的设计、工程技术和管理控制措施来消除或控制潜在危害。供应商应向员工提供适当的、妥善维护的个人防护装备，并制定防护计划保护员工健康。

Suppliers shall identify, assess, and control chemical, biological, and physical exposure risks that employees may face. Potential hazards shall be eliminated or controlled through appropriate design, engineering, and administrative controls. Suppliers shall provide employees with suitable, well-maintained personal protective equipment (PPE) and implement protective plans to safeguard employee health.

2.6 重体力工作

2.6 Physically Demanding Work

供应商应当识别、评估和控制重体力工作对员工可能造成的影响。重体力工作包

括人工搬运/装卸材料和重复搬举重物、长时间站立以及高度重复或强度较高的装配工作。

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 机械安全防护

2.7 Machine Safeguarding

供应商应当对生产性机械和其他设备定期进行评估，确认是否存在安全隐患。应当为可能对员工造成伤害的机械安装物理防护装置、联锁装置和屏障，并正确地进行维护。

Suppliers shall conduct regular evaluations of production machinery and other equipment to identify any potential safety hazards. Physical guards, interlocks, and barriers shall be installed and properly maintained on machinery that could cause harm to employees.

2.8 食品、公共卫生和住宿

2.8 Food, Sanitation and Housing

供应商应向员工提供干净的洗手间设施、饮用水和卫生的食品配制、存储和用餐设施。供应商应确保所提供的员工宿舍保持干净、安全，并有适当的应急出口、洗浴热水、充足的照明、供暖和通风、用于存放个人贵重物品的可上锁储物柜、合理的个人空间以及合理的出入权利。

Suppliers shall provide employees with clean toilet facilities, potable water and hygienic food preparation, storage and dining facilities. Suppliers shall ensure that the provided dormitories are kept clean and safe, appropriate emergency exits, hot bath water, adequate lighting, heating and ventilation, lockable lockers for personal valuables, reasonable personal space and reasonable access.

2.9 健康与安全沟通

2.9 Health and Safety Communication

供应商应当以员工使用或能够理解的语言，向员工提供适当的工作场所健康与安全信息和培训，内容涵盖员工面临的所有已确定的工作场所危害，包括但不限于机械、电气、化学、火灾和物理危害。供应商应在工厂内清晰地张贴或在工人可识别且可出入的场所放置有关健康与安全的信息。供应商应在员工开始工作之前对其进行培训，且之后定期培训，应鼓励员工提出安全问题。

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. 环境保护

3. Environmental Protection

供应商应在保障员工健康和安全的同時，尽可能地降低对社区、环境和自然资源造成的不利影响。

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

3.1 环境许可证和报告

3.1 Environmental Permits and Reporting

供应商应当取得、维护并更新法律要求的所有环境许可证（如排放监测）、批准文书和登记证，并且遵循其中规定的操作要求和报告要求。

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 防止污染

3.2 Pollution Prevention

供应商应遵守与污染物（包括固体废弃物、废水、废气和噪声等）相关的法律法规，包括产生、运输、存储、处理和排放等各环节涉及的要求，并积极寻找可减少或消除污染物产生和排放的方法。同时应致力于节约自然资源，包括但不限于水、化石燃料、矿物和森林产品等。

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 有害物质

3.3 Hazardous Substances

供应商应识别、标记和管理会对人类或环境产生危险的化学品、废弃物及其他材料，确保其得到安全处理、转移、储存、使用、回收或再利用及处置。供应商应追踪和记录有害物质处置数据。

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 固体废弃物

3.4 Solid Waste

供应商应识别、管理、减少、负责任地处置或循环再生/再利用固体废弃物。供应商应追踪和记录固体废弃物数据。

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

3.5 废气管理

3.5 Air Emissions

供应商应对于生产经营过程中产生的挥发性有机化学物质、气胶、腐蚀性气体、微粒、消耗臭氧物质及燃烧副产品，在排放之前应按要求进行分类、常规监测、控制和处理。消耗臭氧层物质应按照《蒙特利尔议定书》和适用的条例进行有效管理。供应商应对其空气排放物控制系统的运行状况进行常规监控。

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 噪音管理

3.6 Noise Management

供应商应识别、控制、监测和降低设施设备产生的影响厂界噪音等级的噪声源。

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

3.7 水资源管理

3.7 Water Management

供应商应实施水资源管理计划，记录、分类和监测水资源使用和排放情况，保护水资源、寻求节约用水的机会，并有效控制污染。废水处置或排放前，应按要求

进行分类、监测、控制和处理，应对其废水处理和控制系统的运行状况进行常规监控，以确保最佳性能，并避免违法排放和溢流产生的废水进入雨水排放管道、公共供水系统及公共水域。

Suppliers shall implement a water resource management plan to record, classify, and monitor water use and discharge, protect water resources, seek opportunities for water conservation, and effectively control pollution. Prior to disposal or discharge, wastewater shall be classified, monitored, controlled, and treated as required. The operational status of wastewater treatment and control systems shall be subject to routine monitoring to ensure optimal performance and to prevent unlawful discharges and overflowing wastewater from entering stormwater drains, public water supply systems, and public water bodies.

3.8 能源消耗和温室气体排放

3.8 Energy Consumption and Greenhouse Gas Emissions

供应商应建立并报告公司级别的温室气体减排目标，并对能源消耗、所有范围一及范围二、范围三重要类别的能源和温室气体排放数据进行追踪、记录和报告。供应商应根据自身的生产情况，评估潜在的替代解决方案，降低对传统能源、水和自然资源的使用，从而减少温室气体排放。供应商应公开披露温室气体管理体系及减排目标实现进程。

Suppliers shall establish and report corporate-level greenhouse gas emission reduction targets, and shall track, record, and report data on energy consumption as well as energy and greenhouse gas emissions for all Scope 1, Scope 2, and significant Scope 3 categories. Suppliers shall also, based on their own production conditions, evaluate potential alternative solutions to reduce reliance on traditional energy, water, and natural resources, thereby lowering greenhouse gas emissions. Suppliers should publicly disclose their greenhouse gas management systems and the progress in achieving emission reduction targets.

4. 商业道德

4. Business Ethics

供应商在所有商业交往中都应秉承最高的道德标准，对违反商业道德行为奉行零容忍政策。

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 商业诚信

4.1 Integrity

禁止供应商发生腐败和不诚信事件，做到“不行贿、不送礼、不关联、不弄虚作假、不偷工减料、不商业欺诈、信守承诺”，即“六不一守”。

Suppliers may not engage in bribery or unethical conduct. Suppliers must follow the requirements of “no bribery, no gifts, no conflicts of interest, no falsification, no cutting corners, no fraud, and keeping promises”.

4.2 信息披露

4.2 Information Disclosure

供应商所有业务交易的开展均应透明并且准确地反映在参与者的商业账簿和记录中。应当根据相关法规和现行行业实践披露有关参与者的劳工、健康与安全、环境实践、业务活动、结构、财务状况和绩效的信息。不得对记录弄虚作假，亦不得对供应链的状况或实践做虚假陈述。

All business transactions conducted by suppliers shall be transparent and accurately reflected in their own accounting books and records. Information regarding the suppliers’ labor practices, health and safety conditions, environmental practices, business activities, organizational structure, financial status, and performance shall be disclosed in accordance with relevant regulations and prevailing industry practices. Suppliers shall not falsify records nor make

misrepresentations regarding the conditions or practices within their supply chain.

4.3 知识产权

4.3 Intellectual Property

供应商应当尊重知识产权，以保护知识产权的方式进行技术或经验知识的转让，并且保护客户和供应商的信息安全。

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 公平交易、广告发布和竞争

4.4 Fair Business, Advertising and Competition

供应商应秉持公平业务、广告发布和竞争标准，遵守所有适用的相关法律。

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

4.5 身份保护和禁止报复

4.5 Protection of Identity and Non-Retaliation

除非法律禁止，否则供应商应制定并实施相关计划，确保向检举问题的供应商和员工提供保护并为他们保密，使他们处于匿名状态。供应商应建立反报复专项机制（详见第七章），明确报复行为的认定标准和处罚措施。

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 隐私保护

4.6 Privacy Protection

供应商应承诺为与其有业务往来的所有人士（包括供应商、客户、消费者和员工）的个人信息保密。收集、存储、处理、传输和分享个人信息时，供应商应遵守与

隐私和信息安全有关的法律和法规的要求。

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 检举渠道

4.7 Reporting Channels

供应商若发现任何有悖于商业道德的行为，应依据《华勤技术反腐败与反商业贿赂政策》的规定进行检举。

Suppliers shall, in accordance with the provisions of the *Huaqin Technology Anti-Corruption and Anti-Commercial Bribery Policy*, report any conduct that violates business ethics.

- 专用举报邮箱: report@huaqin.com
- special email address: report@huaqin.com
- 举报热线及微信: 18516617679 (独立专线、专人管理)
- Reporting Hotline and WeChat: 18516617679 (independent line, managed by dedicated personnel)

5. 管理体系

5. Management Systems

供应商应建立一个包含但不限于本准则内容的管理体系，并持续改进和提升。

Suppliers shall establish a management system that includes, but is not limited to, the content of the Code and shall continuously improve and upgrade it.

5.1 公司承诺

5.1 Company Commitment

供应商应当制定并发布社会与环境责任政策，承诺遵守相关法律法规，且经执行

管理层批准并以当地语言或当地员工可以理解的语言在工作场所发布。

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 管理层职责与责任

5.2 Management Duties and Responsibilities

供应商应指定公司代表来负责保证管理体系和相关计划的落实；高阶管理层应定期检查管理体系的运行情况。

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 法律要求及客户要求

5.3 Legal and Customer Requirements

供应商应制定程序识别、监控并理解适用的法律法规和客户要求（及本准则要求）。

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

5.4 风险评估和管理

5.4 Risk Assessment and Management

供应商应制定程序识别公司经营相关的法律合规性、环境、健康与安全及劳工活动和道德风险。确定各风险的相对重要程度，实施适当的程序和实质控制措施，以控制已识别的风险并确保合规。供应商应对高风险供应商（如位于劳动力密集型地区、行业存在系统性劳工风险的供应商）进行专项评估。

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 持续改进

5.5 Continuous Improvement

供应商应制定书面绩效目标、指标和实施计划，并定期评估拟定的这些目标、计划的执行进展情况。

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 培训

5.6 Training

供应商应为管理层及员工制定培训计划，落实华勤技术的政策、程序及改进目标并满足适用的法律和法规的要求。新进员工须安排参加入职培训、企业社会责任行为准则政策等核心课程的教育训练。培训内容应包含申诉渠道的使用、反报复政策等（详见第七章）。

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 training courses, including orientation and Corporate Social Responsibility (CSR) Code of Conduct and policies. Training content shall include the use of grievance channels, anti-retaliation policies, and other related topics (see Chapter 7 for details).

5.7 沟通

5.7 Communication

供应商应有明确程序，将公司的政策、实践、预期和绩效清晰准确地传达给员工、供应商和客户。

Suppliers should have clear procedures for communicating the company's policies, practices, expectations, and performance clearly and

accurately to employees, suppliers, and customers.

5.8 申诉和反馈

5.8 Complaints and Feedback

供应商应建立有效的申诉和反馈机制，确保所有员工（包括外来务工者、临时工、学生工等弱势群体）均能够安全、匿名地提出意见、建议和投诉。

Suppliers shall establish an effective grievance and feedback mechanism to ensure that all workers (including vulnerable groups such as migrant workers, temporary workers, and student workers) are able to safely and anonymously raise opinions, suggestions, and complaints.

5.8.1 多渠道申诉

Multi-Channel Grievance Mechanism

供应商应提供以下至少三种类型的申诉渠道，并确保所有工人知晓：

- **书面渠道：**实体意见箱（设于非监控区域）、书面投诉表格；建议箱应每周至少开启一次。
- **电子渠道：**专用申诉邮箱、微信/WhatsApp 举报账号、在线投诉平台。
- **口头渠道：**申诉热线电话、面对面与 HR 或工人代表沟通。
- **第三方渠道：**引入独立第三方托管的申诉平台，确保绝对匿名和独立性。

Suppliers shall provide at least three types of grievance channels and ensure that all workers are aware of them:

- **Written channels:** Physical suggestion boxes (located in non-monitored areas) and written complaint forms; suggestion boxes shall be opened at least once a week.
- **Electronic channels:** Dedicated grievance email, WeChat/WhatsApp reporting accounts, and online complaint platforms.
- **Oral channels:** Grievance hotline and face-to-face communication with HR or worker representatives.
- **Third-party channels:** Independent third-party-hosted grievance platforms to ensure absolute anonymity and independence.

5.8.2 多语言可及性

Multilingual Accessibility

所有申诉渠道信息（含操作指引）必须使用员工母语或能够理解的语言，在工作场所显著位置张贴（如食堂、宿舍、车间公告栏）。对于外籍劳工聚集的工厂，至少应提供中文和工人主要使用语言的版本。

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 实名与匿名保护

Identified and Anonymous Protection

供应商应同时接受实名和匿名申诉，并对其一视同仁。无论申诉方式如何，供应商均应为申诉人严格保密。供应商应制定反报复政策，明确禁止因员工提出申诉而对其实施解雇、降薪、调岗、排挤或其他不利待遇，违者应从重处罚。

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 处理时效

Processing Timelines

供应商应建立申诉处理时限制度：

- 受理确认：收到申诉后 48 小时内向申诉人确认收到（匿名申诉除外）。
- 初步评估：3 个工作日内完成申诉分类和严重等级评估。
- 调查处理：一般申诉 15 个工作日内办结；涉及重大违规（如童工、强迫劳动、严重安全危害）的申诉 7 个工作日内启动应急调查，30 个工作日内出具处

理结论。

- 结果反馈：处理完成后 5 个工作日内向申诉人反馈结果（含处理措施和申诉人不满意时的再申诉路径）。

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 跟踪与有效性评估

Tracking and Effectiveness Evaluation

供应商应建立申诉案件电子台账管理系统，记录每件申诉的受理日期、类型、调查过程、处理结论和时效。供应商应每季度统计分析申诉数据，并向华勤技术提交季度申诉数据汇总报告。供应商应至少每年进行一次员工申诉满意度调查，并将调查结果纳入 CSR 管理评审。

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 员工参与

Worker Participation

供应商应建立员工申诉委员会 (Worker Grievance Committee)，由工人直接选举产生的代表参与申诉机制的设计、运行监督和改进讨论。委员会应至少每季度召开一次会议，审议申诉数据和趋势分析报告。

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 评估与审核

5.9 Self-Assessments and Audits

供应商应定期进行自评和内审，确保符合法律法规要求，及本准则和质量协议中与社会责任相关的要求。供应商应每年至少进行一次全面的 CSR 自我评估，使用华勤技术提供的评估工具包。供应商应配合华勤技术或其委托的第三方审核机构进行的定期审核和不事先通知的飞行审核。审核发现的任何不符合项，供应商应在约定的时限内提交纠正与预防措施计划 (CAP)，并按计划完成整改。

Suppliers shall conduct regular self-assessments and internal audits to ensure compliance with applicable laws and regulations, as well as the social responsibility-related requirements set forth in this Code and the quality agreement. Suppliers shall conduct a comprehensive CSR self-assessment at least annually, using the assessment toolkit provided by Huaqin Technology. Suppliers shall cooperate with periodic audits and unannounced spot audits conducted by Huaqin Technology or its designated third-party audit firms. For any non-conformities identified during audits, suppliers shall submit a Corrective and

Preventive Action Plan (CAP) within the agreed timeframe and complete remediation in accordance with the plan.

5.10 纠正措施流程

5.10 Corrective Action Process

供应商应定期进行自我评估, 以确保符合与社会责任和环境责任相关的法律和监管要求、本准则内容的要求及客户合同要求。对评估发现的不符合项, 供应商应实施根本原因分析并采取纠正和预防措施。

Suppliers should conduct periodic self-assessments to ensure compliance with legal and regulatory requirements relating to social and environmental responsibility, the content of the Code and customer contractual requirements. For non-conformities identified during assessments, suppliers shall conduct root cause analysis and implement corrective and preventive actions.

5.11 文件和记录

5.11 Documents and Records

供应商应创建并维护文件和记录, 以确保监管合规并遵守公司的要求及符合保护隐私的相关保密条款。

Suppliers shall create and maintain documents and records to ensure regulatory compliance and compliance with company requirements and relevant confidentiality provisions to protect privacy.

6. 供应链管理

6. Supply Chain Management

供应商应建立供应链 CSR 管理体系, 包括将本准则纳入采购流程、要求上游供应商签署 CSR 承诺书、定期审核等, 确保上游供应商持续合规和改进。

Suppliers should establish a supply chain CSR management system, including incorporating the Code into the procurement process, requiring the upstream supplier to sign a CSR commitment, and conducting regular audits to ensure continuous compliance and

improvement by the upstream supplier.

6.1 公司承诺

6.1 Company Commitment

供应商应当制定并发布社会与环境责任政策，承诺遵守相关法律法规，且经执行管理层批准并以工人使用的语言或工人当地语言或当地员工可以理解的语言在工作场所工厂发布。

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 限用物质

6.2 Material Restriction

供应商应遵守所有适用的有关禁止或限制性物质的法律法规和客户要求，如 RoHS、REACH 等，采取有效措施禁止或限制在产品中或/和制造过程中使用特定的物质。

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 负责任地采购矿物

6.3 Responsible Sourcing of Minerals

供应商应制定政策，合理确保他们所制造的产品中的钽、锡、钨、金和钴等金属不会直接或间接地为刚果民主共和国或周边国家/地区内践踏人权的武装组织提供资金或使他们得益。参与者应对这些矿物的来源和产销监管链进行尽职调查，并且应客户要求向客户提供他们的尽职调查措施。

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 供应商责任

6.4 Supplier Responsibility

要求供应商制定程序将本准则要求传递至下一级供应商，并监管其对本准则的遵守和实行。

Suppliers shall establish procedures to communicate the requirements of the Code to their next-tier suppliers and monitor their compliance with and implementation of the Code.

7. 申诉与举报程序

7. Grievance and Whistleblowing Procedures7.1 原则与范围

7.1 Principles and Scope

华勤技术致力于为所有利益相关方（包括本公司及各级供应商的员工、合同工、临时工、外来务工者等）提供安全、可靠、便捷、匿名的申诉与举报机制。

Huaqin Technology is committed to providing a safe, reliable, accessible, and anonymous grievance and whistleblowing mechanism for all stakeholders (including employees, contract workers, temporary workers, and migrant workers of the Company and suppliers at all tiers). 本机制遵循以下核心原则：

This mechanism adheres to the following core principles:

原则 Principle	说明 Description
可及性 Accessibility	申诉渠道应多渠道、多语言、全天候可及，确保所有员工（含临时工、外籍劳工）均能无障碍使用。 Grievance channels shall be multi-channel, multilingual, and accessible around the clock to ensure that all workers

	(including temporary workers and foreign workers) can use them without barriers.
匿名性 Anonymity	坚定支持并保护匿名举报，不对匿名举报设置任何不合理限制或歧视。 We firmly support and protect anonymous reporting, and shall not impose any unreasonable restrictions or discrimination on anonymous reports.
保密性 Confidentiality	严格保护举报人身份信息和举报内容，仅限授权调查人员知悉。 The identity information of whistleblowers and the content of their reports shall be strictly protected and made known only to authorized investigation personnel.
非报复性 Non-Retaliation	确保举报人不会因善意举报遭受任何形式的报复、歧视或不利待遇。 Ensure that whistleblowers will not suffer any form of retaliation, discrimination, or adverse treatment as a result of making reports in good faith.
时效性 Timeliness	承诺受理确认、调查、处理和反馈的全流程时限，并对外公开绩效数据。 Commit to timeframes for the entire process of acknowledgement, investigation, resolution, and feedback, and publicly disclose performance data.
透明性 Transparency	定期公开披露申诉处理统计数据（脱敏后），接受利益相关方监督。 Regularly publicly disclose grievance handling statistics (after de-identification) and accept oversight by stakeholders.
持续改进 Continuous	定期评估申诉机制的有效性，根据反馈和数据分析持续优化机制设计。

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

7.2 供应商工人申诉渠道规范

7.2 Grievance Channel Standards for Supplier Workers

华勤技术要求所有供应商必须在其运营场所建立并维持符合以下标准的工人申诉机制，并接受华勤技术及第三方的定期审核。

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 多渠道建设要求

Multi-Channel Construction Requirements

每家供应商工厂应至少建立以下四类申诉渠道：

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

(a) 实体渠道：在非监控区域设置带锁意见箱，数量不少于每 200 名工人 1 个；提供纸质申诉表格供随时取用。意见箱由工人代表和 HR 共同开启，至少每周开启一次。

(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) 电话渠道：设置专用申诉热线，确保工作时间有专人接听；非工作时间支持语音留言或转接至第三方托管热线。

(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) 数字渠道: 提供专用申诉邮箱、企业微信/微信公众号或 WhatsApp 举报入口, 支持文字、语音和图片上传。

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

(d) 面对面渠道: 工厂 HR 或工人关系专员定期在车间、食堂巡访; 设立工人申诉委员会, 工人可直接向委员会成员反映问题。

(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 信息公示要求

7.2.2 Information Disclosure Requirements

供应商必须在以下位置以工人能够理解的所有语言张贴申诉渠道信息(含完整操作指引):

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

- 工厂主入口
- 每个生产车间
- 员工食堂
- 员工宿舍公告栏
- 新员工入职培训材料(必须包含申诉渠道培训模块)
- Main factory entrance
- Each production workshop
- Employee canteen
- Employee dormitory bulletin boards
- New employee onboarding training materials (must include a grievance channel training module)

公示内容应至少包含：各类申诉渠道的使用方法、受理范围、处理时限、反报复政策声明、申诉人权利告知。

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 申诉受理范围

Scope of Grievance Acceptance

供应商工人可通过申诉机制报告以下类型的问题（非穷尽列举）：

Supplier workers may report the following types of issues through the grievance mechanism (non-exhaustive list):

- 工资支付问题（欠薪、克扣、未足额支付加班费等）
- 工时违规（强迫加班、超时工作、休息权受侵害等）
- 职场骚扰与歧视（性骚扰、种族歧视、性别歧视等）
- 健康安全隐患（不安全的工作条件、缺乏 PPE 等）
- 强迫劳动与童工
- 结社自由与集体谈判权受侵害
- 不人道待遇（体罚、辱骂、精神胁迫等）
- 环境污染事件
- 商业贿赂与腐败
- 其他违反本准则或适用法律的行为
- Wage payment issues (wage arrears, unauthorized deductions, failure to fully pay overtime premiums, etc.)
- Working hours violations (forced overtime, excessive working hours, infringement of rest rights, etc.)
- Workplace harassment and discrimination (sexual harassment, racial discrimination, gender discrimination, etc.)
- Health and safety hazards (unsafe working conditions, lack of PPE, etc.)
- Forced labor and child labor

- Infringement of freedom of association and collective bargaining rights
- Inhumane treatment (corporal punishment, verbal abuse, mental coercion, etc.)
- Environmental pollution incidents
- Commercial bribery and corruption
- Other acts that violate this Code or applicable laws

7.3 华勤技术多层级举报渠道

7.3 Multi-Tier Reporting Channels to Huaqin Technology

为发现、防止及避免任何不道德或违反本准则之行为，华勤技术建立了多层级举报体系。任何员工、供应商工人或第三方均可选择以下任一渠道进行举报。所有举报渠道均支持实名和匿名方式，华勤技术将一视同仁对待实名与匿名举报信息，对举报信息依法依规客观调查、公正处理并反馈。

To identify, prevent, and avoid any unethical acts or violations of this Code, Huaqin Technology has established a multi-tiered reporting system. Any employee, supplier worker, or third party may choose any of the following channels to file a report. All reporting channels support both identified and anonymous reporting. Huaqin Technology will treat identified and anonymous reports equally, conducting objective investigations, fair handling, and feedback in accordance with laws and regulations.

举报途径 Channel Tier	渠道 Channel	适用范围 Scope
华勤 CSR 委员会 Huaqin CSR Committee	邮箱 Email: HQCSR@huaqin.com 热 线 Tel : 021- 80221124	适用于所有利益相关方 涵盖劳工、人权、环境等 社会责任类举报 Applicable to all stakeholders Covers labor, human rights, environment, etc.

		Social responsibility-related reporting
华勤风控委员会 Huaqin Risk Control Committee	邮箱 Email: report@huaqin.com 热 线 Tel : 18516617679	适用于涉及高层管理人员或重大系统性违规的举报 Applicable to reports involving senior management or major systemic violations

7.4 调查与处理程序

7.4 Investigation and Remediation Process

7.4.1 受理与确认（48 小时内）

Acceptance and Acknowledgement (Within 48 Hours)

收到举报后 48 小时内向举报人确认受理（匿名举报无法确认的除外）。确认信息应包含：举报编号（供后续查询）、预期处理时限、举报人权利告知（含反报复保护承诺）。

Upon receipt of a report, acknowledge acceptance to the reporter within 48 hours (except where anonymous reports cannot be acknowledged). The acknowledgement shall include: a report reference number (for follow-up inquiries), expected processing timeline, and notification of the reporter's rights (including the anti-retaliation protection commitment).

7.4.2 初步评估与分流（3 个工作日内）

Initial Assessment and Triage (Within 3 Working Days)

华勤技术 CSR 团队对举报内容进行初步评估，确定：举报严重等级（一般/严重/重大）、责任主体（属于哪家供应商/部门）、适用调查程序。涉及强迫劳动、童工、严重安全危害的举报自动列为「重大等级」，启动紧急调查程序。

The Huaqin Technology CSR team shall conduct an initial assessment of the report content to determine: the severity level of the report (general/serious/critical), the responsible party (which supplier/department it pertains to), and the applicable investigation

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 调查实施

Investigation Implementation

严重等级 Severity Level	调查启动时限 Investigation Launch Timeline	调查方式 Investigation Method	办结时限 Resolution Timeline
一般 General	5 个工作日内 Within 5 working days	文件审查、远程电话访谈 Document review, remote telephone interviews	10 个工作日 10 working days
严重 Serious	3 个工作日内 Within 3 working days	现场调查（含飞行审核） On-site investigation (including unannounced audits)	30 个工作日 30 working days
重大 Critical	24 小时内启动 Within 24 hours	紧急现场调查 Emergency on-site investigation 通知华勤技术 ESG 执行委员会 和采购体系管理层 Notify Huaqin Technology ESG Executive Committee and procurement management	15 个工作日 15 working days

7.4.4 处理与反馈

Resolution and Feedback

调查结束后，华勤技术 CSR 团队出具调查结论和处理意见，并在 5 个工作日内向举报人反馈（匿名举报无法反馈的除外）。处理措施可包括但不限于：要求供应商限期整改（含纠正与预防措施计划）、对供应商进行罚款或扣分、暂停新业务合作、终止合作关系、移送法律程序等。举报人对处理结果不满意的，可在收到

反馈后 10 个工作日内申请复核，由上一级管理团队或独立第三方复审。

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, terminating the business relationship, and referring the matter to legal proceedings. If the reporter is not satisfied with the outcome, they may apply for a review within 10 working days of receiving the feedback, which shall be conducted by a higher-level management team or an independent third party.

7.4.5 闭环追踪

Closed-Loop Tracking

所有纠正措施计划（CAP）必须设定明确的完成时限和责任主体。华勤技术 CSR 团队对 CAP 执行情况进行跟踪验证，在 CAP 关闭后进行效果评估（验证整改是否有效消除根本原因）。CAP 关闭不等于案件关闭——案件应在 CAP 效果评估通过后方可正式关闭。

All Corrective Action Plans (CAPs) must be assigned clear completion deadlines and responsible parties. The Huaqin Technology CSR team shall track and verify CAP implementation, and conduct an effectiveness assessment upon CAP closure (verifying whether the corrective actions have effectively eliminated the root cause). CAP closure does not equate to case closure — a case may only be formally closed after the CAP effectiveness assessment has been passed.

7.5 反报复保护机制

7.5 Anti-Retaliation Protection

7.5.1 报复行为的明确定义

Clear Definition of Retaliation

以下行为（非穷尽列举）被认定为报复行为：解雇或威胁解雇、降薪或降职、调离原岗位或转至不利岗位、排挤、孤立或恐吓、负面绩效评价（无正当理由）、列入黑名单影响再就业、人身威胁或暴力、其他任何因举报行为而对举报人产生的不利待遇。

The following acts (non-exhaustive list) are deemed to constitute retaliation: dismissal or threat of dismissal, wage reduction or demotion, transfer from the original position or reassignment to a disadvantageous position, ostracism, isolation, or intimidation, negative performance reviews (without just cause), inclusion on a blacklist affecting future employment, physical threats or violence, and any other adverse treatment against a reporter as a result of their reporting.

7.5.2 反报复保障措施

Anti-Retaliation Safeguards

- 对善意举报人因举报行为遭受的任何不利待遇，公司将采取补救措施，包括恢复原职位、补发工资等。
- The Company shall take remedial measures for any adverse treatment suffered by a good-faith reporter as a result of reporting, including reinstatement to the original position and back pay.
- 将报复行为列为严重违反本准则的行为，一经查实，对实施报复的个人或供应商从重处罚。

Retaliation is classified as a serious violation of this Code; once verified, individuals or suppliers who engage in retaliation shall be subject to severe penalties.

- 设立反报复举报通道：esg@huaqin.com，处理举报人遭受报复的申诉。
- A dedicated anti-retaliation reporting channel is established: esg@huaqin.com, exclusively for handling complaints from

reporters who have experienced retaliation.

- 定期回访举报人（举报结案后第 30 天、90 天、180 天），确认其未遭受任何形式的报复。
- 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.
- 对举报人提供法律支持，包括协助联络法律援助机构。
- Legal support shall be provided to reporters, including assistance in contacting legal aid organizations.

7.5.3 供应商反报复责任

Supplier Anti-Retaliation Responsibilities

供应商必须：制定并公示反报复政策、向所有员工进行反报复培训（纳入新员工入职培训必修模块）、对实施报复的管理人员采取严肃纪律处分（直至解雇）、配合华勤技术对报复举报的调查。

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 跟踪、监控与有效性评估

7.6 Tracking, Monitoring & Effectiveness Evaluation

7.6.1 申诉数据管理系统

Grievance Data Management System

华勤技术建立并维护统一的申诉案件管理台账（Case Management System），记录每件申诉的完整生命周期数据：受理编号、受理时间、渠道来源、举报人类型（华勤员工/供应商工人/第三方）、举报类别、严重等级、调查过程、处理结论、CAP 计划及完成情况、时效达成情况。

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 申诉机制关键绩效指标 (KPI)

Key Performance Indicators (KPIs) for the Grievance Mechanism

华勤技术对申诉机制设立以下 KPI，按年度进行统计和评审：

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

KPI 指标 Indicator	考核内容 Description	目标 Target
受理确认时效达标率 Acknowledgement Timeliness Compliance Rate	48 小时内确认受理的比例 Proportion of cases acknowledged within 48 hours	≥95%
调查办结时效达标率 Investigation Resolution Timeliness Compliance Rate	在规定时限内完成调查的申诉比例 Proportion of grievances resolved within the specified timeframe	≥90%
CAP 按时关闭率 CAP On-Time Closure Rate	纠正措施计划按时完成关闭的比例 Proportion of corrective action plans closed on time	≥95%
举报人满意度 Reporter Satisfaction Rate	举报人对处理过程和结果的满意率 Reporter satisfaction with the handling process and outcome	≥80%
报复事件发生率 Retaliation Incident Rate	查实的举报人遭受报复的事件数量 Number of verified retaliation incidents against reporters	0

重大申诉办结时效	涉及强迫劳动/童工等重大申诉的平均办结	≤15 天
Critical Case Resolution	天数	≤15 days
Timeliness	Average resolution days for critical cases involving forced labor/child labor, etc.	

7.6.3 有效性年度评估

Annual Effectiveness Evaluation

华勤技术每年对申诉机制的有效性进行综合评估，评估维度包括：

Huaqin Technology shall conduct a comprehensive annual evaluation of the effectiveness of the grievance mechanism, with assessment dimensions including:

- 申诉渠道的可及性
- 匿名举报的占比及趋势
- 员工对申诉机制的信任度（匿名问卷调查）
- KPI 达成情况分析
- 重大申诉的根本原因分析和系统性改进
- 对比行业最佳实践的差距分析与改进建议
- Accessibility of grievance channels
- Proportion and trend of anonymous reporting
- Worker trust in the grievance mechanism (anonymous questionnaire survey)
- KPI performance analysis
- Root cause analysis of critical grievances and systemic improvement
- Gap analysis against industry best practices and improvement recommendations

评估报告呈报华勤技术 ESG 执行委员会审议，并将评估结论和改进计划对外公开披露。

The evaluation report shall be submitted to the Huaqin Technology ESG Executive Committee for review, and the evaluation conclusions and

improvement plan shall be publicly disclosed.

7.7 员工参与与持续改进

7.7 Worker Participation and Continuous Improvement

7.7.1 员工申诉委员会

Worker Grievance Committee

华勤技术鼓励并要求各供应商建立「员工申诉委员会」(Worker Grievance Committee, WGC)。WGC 由员工直接选举产生(非管理层指定),成员应涵盖不同车间、班次和用工类型的员工代表。WGC 参与申诉机制的日常运营监督,定期审议匿名化申诉数据报告,就常见或系统性问题与管理层协商改进。

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 持续改进机制

Continuous Improvement Mechanism

华勤技术将基于以下信息源持续改进申诉机制:申诉数据分析识别的趋势和模式、工人调查和 WGC 反馈、MSCI 等 ESG 评级机构的反馈。

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. 透明度与信息披露

8. Transparency and Information Disclosure

8.1 供应商审计信息披露

8.1 Supplier Audit Information Disclosure

华勤技术承诺每年在 ESG 报告/可持续发展报告中公开披露：

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

- 年度供应商审计总次数（含定期审核和飞行审核次数）
- 审计覆盖率（已审计供应商占活跃供应商总数的比例）
- 审计发现的主要不符合项类型分布（如工资工时、健康安全、环境排放等）
- 供应商纠正措施的完成率和时效
- 因严重违规被暂停或终止合作的供应商数量
- 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 冲突矿产尽职调查披露

8.2 Conflict Minerals Due Diligence Disclosure

华勤技术承诺每年公开披露冲突矿产尽职调查结果，包括：供应链中 3TG（锡、钽、钨、金）和钴的来源国分布、冶炼厂/精炼厂合规状态（通过 RMI RMAP 合规认证的比例）、尽职调查过程中发现的不符合项及纠正措施。

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 温室气体排放与碳目标披露

8.3 Greenhouse Gas Emissions and Carbon Target Disclosure

华勤技术要求供应商公开披露其温室气体排放数据（范围一和范围二至少每年更新一次）和减排目标进度。华勤技术自身承诺每年披露范围一、范围二及范围三重要类别的排放数据，以及碳减排目标的实现进度。

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 数据质量保证

8.4 Data Quality Assurance

华勤技术承诺对所披露的 ESG 数据进行内部审核和外部鉴证（至少对关键数据进行有限鉴证），并持续提升数据收集、统计和披露的完整性和准确性。

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.

《华勤技术供应商社会责任行为准则》为华勤技术各项规章制度，合同协议，及商业准则之补充，非意在为任何第三方谋求新的或额外权利。华勤技术保留对本准则的最终解释权。

The Code supplements Huaqin Technology's various rules and regulations, contractual agreements, and business principles. It is not intended to create any new or additional rights for any third party. Huaqin Technology reserves the right of final interpretation of the Code.

华勤技术股份有限公司

Huaqin Technology Co., Ltd.

2026 年 7 月 31 日

31 July 2026

【版本历史】

Version history

2024 年 初版

First edition 2024

2025 年 第一次修订版

First Revision 2025

2026 年 第二次修订版

Second Revision 2026