

SUZHOU U.P. WEAR RESISTANCE COMPOUND MATERIALS CO., LTD. ESTABLISHED

苏州优霹耐磨复合材料有限公司

HUMAN RIGHTS POLICY STATEMENT / 人权政策声明

1. Purpose and Scope / 目的与适用范围

Suzhou U.P. Wear Resistance Compound Materials Co., Ltd. (hereinafter referred to as "Suzhou U.P.") is fully committed to respecting and protecting human rights in all aspects of our business operations. This Policy is developed in accordance with international human rights standards (including the UN Guiding Principles and ILO Declaration) and global supply chain compliance requirements to uphold the dignity of all employees, contractors, and stakeholders.

苏州优霹耐磨复合材料有限公司 (以下简称「苏州优霹」) 全力致力于在其所有业务运营环节中尊重并保护人权。本政策依据国际人权标准 (包括联合国指导原则与 ILO 宣言) 及全球供应链合规要求制定, 旨在维护所有员工、承包商及利害关系人之尊严。

2. Core Human Rights Commitments / 核心人权承诺

2.1 Prohibition of Child Labor and Remediation / 禁止童工与补救程序

The Company strictly prohibits the recruitment and employment of child labor. Notwithstanding local requirements, the minimum age for entry into employment shall not be younger than 15 years of age and completion of compulsory education. If child labor is discovered, we maintain a standard remediation procedure focused exclusively on the best interest and welfare of the child.

本公司严禁在任何营运中招募和雇用童工。无论当地法规如何规定, 进入就业的最低年龄不得低于 15 岁且必须完成义务教育。在发现童工的极低概率情况下, 我们设有标准补救程序, 完全专注于该儿童的最佳利益与福利。

2.2 Freely Chosen Employment / 自由选择职业

All employment must be voluntary, and the Company strictly prohibits all forms of forced, bonded, or slave labor. Suzhou U.P. enforces a "Zero Recruitment Fee" policy and strictly prohibits the withholding of original identification documents, passports, or work permits.

所有雇用必须基于自愿原则，本公司严禁任何形式的强迫、债役或奴役劳动。苏州优霏实行「零招募费」政策，并严禁以任何理由扣押员工之身份证件、护照或工作许可原件。

2.3 Zero Tolerance for Sexual Harassment / 性骚扰零容忍

The Company is committed to providing a safe work environment free from sexual harassment. This includes providing functional reporting mechanisms, maintaining formal investigation procedures, committing to cooperate with external compliance investigations if required, and taking strict disciplinary actions (including dismissal) against violators.

本公司致力于提供一个无性骚扰的安全工作环境。这包括提供有效的举报机制、维持正式调查程序、承诺在必要时配合外部合规调查，并针对违规者采取严厉的纪律处分（包括解除劳动合同关系）。

2.4 Freedom of Association / 结社自由

Suzhou U.P. adopts an open attitude towards the legitimate activities of trade unions and respects employees' rights to associate and bargain collectively. Workers' representatives shall not be subjected to discrimination or retaliation.

苏州优霏对工会的合法活动持开放态度，尊重员工依法结社与集体谈判的权利。劳工代表不会因此受到歧视或报复。

2.5 Diversity, Equity, and Inclusion / 多元、平等与包容

We promote a workplace free from discrimination. All employment decisions are based on merit, skills, and qualifications, without regard to gender, race, age, religion, disability, sexual orientation, or political beliefs.

我们致力打造一个无歧视的工作场所。所有雇用决策均基于个人能力、技能和资历，不因性别、种族、年龄、宗教、残疾、性取向或政治信仰而受影响。

3. Management System & Supply Chain / 管理体系与供应链管理

3.1 ISO 45001 & Management Representative / ISO 45001 与管理代表

Our commitment to human rights is integrated into our ISO 45001 Occupational Health and Safety Management System. The Company has assigned a senior "Management Representative" to oversee health, safety, and human rights governance.

我们对人权的承诺已融入 ISO 45001 职业健康安全管理体系中。公司已指派一名高级「管理代表」，专职负责职业健康、安全与人权治理事务。

3.2 Supply Chain Due Diligence / 供应链尽职调查

Suzhou U.P. requires our direct suppliers to mirror the same human rights commitments. We implement screening for Conflict Minerals (3TGs) and require provenance transparency to ensure materials are sourced responsibly.

苏州优霹要求直接供货商体现相同之人权承诺。我们实施冲突矿产 (3TGs) 筛选，并要求来源透明化，以确保原材料的负责任采购。

4. Grievance Mechanisms / 申诉机制

Stakeholders can report suspected violations through our dedicated and confidential email: info@upplate.com.cn. We enforce a strict Non-Retaliation Policy to protect whistleblowers who raise concerns in good faith.

利害关系人可透过我们专门的保密邮箱: info@upplate.com.cn 举报疑似违规行为。我们严格执行不报复政策，以保护出于善意提出问题的举报人。

核准人 (Approved by):



职称 (Title): 总经理

日期 (Date):

0525 2026