

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

苏州优霹耐磨复合材料有限公司

MODERN SLAVERY STATEMENT / 现代奴役法声明

1. Introduction / 前言

Suzhou U.P. Wear Resistance Compound Materials Co., Ltd. (hereinafter referred to as "Suzhou U.P." or "the Company") is firmly committed to social accountability, operating with the highest standards of integrity, ethics, and transparency. This statement is made pursuant to the core principles of global supply chain human rights compliance and the spirit of international Modern Slavery Legislation. It sets out our ongoing policies and material measures to ensure that modern slavery, forced labor, and human trafficking are not taking place in any part of our business operations or supply chains.

苏州优霹耐磨复合材料有限公司（以下简称「苏州优霹」或「本公司」）坚守社会责任承诺，秉持最高道德标准与透明度诚信经营。本声明依据全球供应链人权合规性及国际《现代奴役法》之核心精神编制，阐述本公司持续采取的方针与实质管理措施，以确保业务运营及供应链各环节中不存在现代奴役、强迫劳动与人口贩运。

2. Organizational Structure and Operational Scope / 组织架构与营运范畴

Located in Suzhou, China, Suzhou U.P. is a manufacturing entity specializing in world-leading wear-resistant materials, composite wear plates, flux-cored welding wires, and hardfacing reclamation welding services. Our supply chain encompasses upstream raw material (steel and alloy) suppliers, professional third-party logistics providers, and labor service contractors.

苏州优霹位于中国苏州，是全球领先的耐磨材料、耐磨复合钢板、药芯焊丝制造及硬面堆焊再生技术服务的生产实体。我们的供应链体系包含：上游钢铁与合金原物料供货商、专业第三方物流服务商，以及劳务服务承包商。

3. Risk Assessment and Due Diligence / 风险评估与尽职调查

To effectively identify and mitigate potential risks of modern slavery, the Company has embedded human rights governance into its international management systems:

为有效识别与消除潜在的现代奴役风险，本公司将人权治理嵌入国际管理体系中：

Management Systems: Our human rights risks are monitored through our third-party certified

ISO 45001 (Occupational Health and Safety) and ISO 14001 (Environmental) systems.

管理体系：我们透过经第三方认证的 ISO 45001 (职安) 与 ISO 14001 (环境) 体系监控人权风险。

Labor Standards: We enforce a strict "Zero Recruitment Fee" policy. All original identification documents are retained by employees themselves. All overtime is voluntary and tracked within legal limits.

劳动标准：本公司实行严格的「零招募费」政策。所有身份证件原件均由员工本人自行保管。所有加班均基于自愿原则，并在法定工时间内进行控管。

Supply Chain Management: We require all Tier-1 suppliers to sign our Supplier Code of Conduct. We perform regular due diligence to ensure that no raw materials (including Conflict Minerals/3TGs) involved in forced labor enter our production process.

供应链管理：我们要求所有一类 (Tier-1) 供货商签署《供货商行为准则》。我们定期进行尽职调查，确保任何涉及强迫劳动的原物料 (含冲突矿产 3TGs) 均不进入生产流程。

4. Grievance Mechanisms and Remediation / 申诉机制与救济程序

The Company has established accessible and confidential grievance channels. Employees and external stakeholders can report any suspected unethical behavior or human rights violations anonymously via: info@upplate.com.cn.

本公司建有完善且保密的申诉管道。员工及外部利害关系人可透过专用信箱举报任何疑似不道德行为或人权侵害事件：info@upplate.com.cn。

We strictly implement a Whistleblower Protection Policy to guarantee that informants are protected from any form of retaliation. For any verified non-compliance, the Company maintains standard Corrective and Preventive Action (CAPA) and remediation procedures to immediately protect the rights of affected individuals.

我们严格执行举报人保护政策，以确保举报人免受任何形式的报复。对于任何经核实的违规行为，本公司将启动标准的纠正和预防措施 (CAPA) 及补救程序，以立即保护受影响个人的权益。

核准人 (Approved by):



职称 (Title): 总经理

日期 (Date):

05/5 2026