

# **BOE Anti-Discrimination and Anti-Harassment Policy**

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## Purpose

BOE Technology Group Co., Ltd. ("BOE" or the "Group") upholds every employee's right to a workplace free from harassment and discrimination. To foster and maintain a safe and healthy work environment where employees feel respected, BOE has established the Anti-Discrimination and Anti-Harassment Policy (this "Policy").

## Scope of Application

This Policy applies to all employees of BOE. Each unit or organization is authorized to formulate and enact specific guidelines within the confines of this Policy based on their actual conditions, and is strictly required to treat others respectfully in accordance with this Policy and other relevant policies of BOE and its subsidiaries. BOE recognizes that all employees and personnel working for BOE can potentially be perpetrators or victims of harassment and discrimination. BOE's suppliers, including third-party recruitment agencies, must strictly adhere to this Policy and all pertinent regulations concerning "human rights" and "non-discrimination policies and practices" as outlined in the BOE Supplier Code of Conduct.

## Terminology

1. Discrimination: It refers to any act of distinction, exclusion, or preference that undermines equality of opportunity or treatment in employment or occupation, due to race, skin color, gender, religion, nationality, ethnicity, sexual orientation, age, disability, veteran status, marital status, or any other characteristic protected by local laws.

2. Harassment: It refers to a wide range of behaviors or threats that are unacceptable, inappropriate, and unwelcome, regardless of the perpetrator's intent. It is characterized by any action that causes physical, psychological, sexual, or economic harm to another person. Harassment undermines an individual's dignity and well-being, leading to a work environment that is degrading, hostile, humiliating, intimidating, aggressive, or unsafe. Specific forms of harassment include, but are not limited to:

1) Sexual harassment: It refers to unwelcome sexual advances, sexual requests, and other verbal, nonverbal, or physical conduct of a sexual nature that is perceived as offensive or humiliating to others.

2) Physical abuse: It refers to non-accidental, intentional acts of aggression or violence that use force to cause bodily injury, pain, or harm. This can range from severe actions like assault, violence, or threats, to more subtle forms such as unwelcome body contact or touching.

3) Verbal abuse: This involves the inappropriate or excessive use of language to demean or harm an individual's dignity. Verbal abuse includes swearing, shouting, making derogatory comments or insults, and using language that intimidates or threatens others to instill fear.

4) Bullying: It refers to the continuous and intentional misuse of power in relationships through repeated verbal, physical, or social behaviors that aim to cause physical, social, or psychological harm. Bullying can include making

persistent criticism or negative comments, demeaning someone's abilities, isolating or excluding someone, gossiping, and spreading false information, all intended to humiliate or undermine an individual or group's sense of worth.

3. Work environment: For the purposes of this Policy, the term "work environment" covers all scenarios potentially related to work activities. This includes, but is not limited to:

1) Office settings, such as BOE's office buildings, office parks and production facilities, as well as residences and other premises managed or provided by BOE;

2) Work-related travel, training sessions, meetings, or events;

3) Work-related communications, facilitated through information and communication technology, both during and outside office hours;

4) Any location or situation where employees act on behalf of BOE, including remote work arrangements.

## Fundamental Principles

BOE upholds a zero-tolerance policy towards all forms of discrimination and harassment. These include, but are not limited to, sexual harassment, physical or verbal abuse, bullying, and any other forms of offensive behavior. The Group strictly forbids any discrimination or harassment in the processes of employment, compensation, training, promotion, termination, or retirement, based on race, nationality, religion, disability, gender, marital status, political affiliation, age, or any other characteristic protected by local laws.

BOE commits to respecting all rights as stipulated by the UN Convention on the Elimination of All Forms of Discrimination against Women and the ILO's Discrimination (Employment and Occupation) Convention. This Policy is based on the legal frameworks of the People's Republic of China, including the Law on the Protection of Women's Rights and Interests, the Regulations on the Employment of Persons with Disabilities, the Labor Law, the Labor Contract Law, the Employment Promotion Law, and the Civil Code. Additionally, it adheres to the local laws of the countries and regions where BOE operates.

## Roles and Responsibilities

### 1. Employees

1) All employees, including managers and business heads, are responsible for ensuring our work environment is free of any discrimination or harassment;

2) Each employee must ensure their conduct complies with the standards set forth in this Policy and the Employee Handbook, among other policies, in order to foster a healthy and safe work environment where everyone feels respected;

3) Any employee who believes they have been subjected to discrimination, harassment, or any other infringement,

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or have witnessed actions that might violate this Policy, should report to the Group immediately;

4)Managers and business heads have the responsibility to actively enforce and promote this Policy and to promptly investigate, resolve, and provide feedback on any reported incidents.

## **2.BOE**

The Group is dedicated to fostering a work environment that is free of discrimination or harassment in any form. The Group will take proactive steps to implement this Policy, ensuring all complaints and reports of Policy breaches are received and addressed appropriately.

## **Preventative Measures**

BOE is committed to minimizing discrimination and harassment through proactive strategies and ensuring timely and appropriate responses when such incidents occur. BOE recognizes that vulnerable groups, including women, the disabled, and ethnic minorities, face a greater risk of discrimination and harassment. To address this, BOE emphasizes equal employment opportunities, the improvement of accessible environments, the protection of female employees, and policy transparency to combat workplace harassment and discrimination.

## **Equal Employment Opportunities**

Throughout the entire employment process, including recruitment, promotion, development, allocation of benefits, and termination of employment contracts, BOE strictly prohibits any form of differential treatment based on gender, disability, race, or any other reasons. BOE fully considers employees' willingness at every stage of employment and ensures that employees participate in work voluntarily. Forced labor, corporal punishment, intimidation, harassment, abuse, and other behaviors that discriminate against employees are strictly prohibited. Women are afforded the same employment opportunities as men, except in roles or positions deemed unsuitable for women by local regulations.

## **Enhancing Accessibility in the Workplace**

In line with national laws, regulations, and standards for accessibility, BOE provides appropriate workplace accommodations for individuals with disabilities, and continually makes adjustments and enhancements.

## Protection of Female Workers

BOE complies with national and local laws to ensure that female workers are entitled to maternity leave, benefits, and job security during pregnancy and postpartum periods. The Group takes reasonable actions to minimize health and safety risks in the workplace. It strictly prohibits assigning female employees to tasks that are explicitly prohibited by local laws, such as working at height, in low temperatures, or in cold water during their menstrual cycles or pregnancy. Furthermore, the policy extends to nursing mothers of infants under one year old, protecting them from being assigned to tasks restricted by local laws or overtime work or night shifts. Under no circumstances does BOE require employees to undergo pregnancy or virginity tests.

## Policy Disclosure

BOE publicly discloses this Policy along with the Rules for the Elimination of Sexual Harassment in the Workplace across the Group, ensuring that all employees are informed of these policies by prominently displaying them in the workplace.

## Complaint Procedure

BOE seriously addresses both informal and formal complaints about discrimination, harassment, or any violations of this Policy. Upon such instances, the Group will promptly conduct investigations and take appropriate remedial actions. Employees who have either encountered or witnessed any form of harassment or abuse within the Group are strongly encouraged to report these incidents without delay to the designated managers or to lodge a complaint anonymously by:

1. Sending an email to BOE's dedicated mailbox for human rights protection: [humanrights@boe.com.cn](mailto:humanrights@boe.com.cn);
2. Calling the BOE employee support hotline at 400-018-8080.

Managers are expected to thoroughly investigate and address complaints while ensuring confidentiality, in alignment with BOE's established complaint resolution protocols.