

# **BOE Child Labor Prohibition Policy**

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## Purpose

BOE Technology Group Co., Ltd. ("BOE" or the "Group") maintains a zero-tolerance policy against the use of "child labor" (as defined below) in any form. BOE is fully aware that "minor workers" (as defined below) face increased vulnerability to harm. Therefore, in addition to ensuring the safety and health of all employees, the Group provides extra protection for minor workers, keeping them away from risks and preventing their involvement in hazardous tasks.

BOE respects and advocates for the rights of children as defined in the UN Convention on the Rights of the Child. BOE Child Labor Prohibition Policy (this "Policy") is founded upon the principles of the UN Convention on the Rights of the Child, the Law of the People's Republic of China on Protection of Minors, and the Labor Law of the People's Republic of China, and adheres to the local laws of the countries and regions where BOE operates.

## Scope of Application

This Policy is applicable to BOE and its subsidiaries. Each unit or organization is authorized to formulate and enact specific guidelines within the confines of this Policy based on their actual conditions. BOE's suppliers, including third-party recruitment agencies, must strictly adhere to this Policy and all pertinent regulations concerning "child labor, minor workers and female workers" as outlined in the BOE Supplier Code of Conduct.

## Terminology

1. Child labor: This refers to any worker who is under 16 years of age, has not reached the age required to complete compulsory education, or is below the minimum age for employment as set by the laws of the country or region where they work, whichever age is higher.
2. Minor worker: This refers to any worker who is older than the threshold as set out above for child labor but under 18 years of age.
3. Hazardous work: This refers to tasks or labor that could endanger the health or safety of children or minor workers. Hazardous work includes, but is not limited to, operations in mines, high-risk or confined spaces, and environments with harmful conditions such as extreme temperatures, excessive noise, or dust; work involving dangerous machinery or exposure to harmful chemicals or radioactive materials; tasks classified as having a high degree (level IV) of physical intensity according to national standards; or any work deemed hazardous for minor workers by local laws or regulations in regions where BOE operates.

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## Prohibition of Child Labor

### Guiding Principles

BOE views the employment of child labor as a serious breach of laws, which include both international standards and national laws, and is committed to minimizing the risk of illegal child labor.

The Group pledges not to employ any form of child labor within its operations and production facilities. Furthermore, BOE undertakes the following measures to prevent the risk of child labor:

1. BOE has implemented a comprehensive age verification system as part of its recruitment process. The Group conducts thorough reviews and verifications of documents pertaining to applicants' ages and interviews those who meet the job requirements;
2. BOE mandates that its recruitment policies explicitly incorporate the minimum age for employment in alignment with international standards and applicable local laws and regulations, as a criterion for employment decisions at all levels;
3. BOE maintains records of employees involved in the recruitment process and continuously monitors and tracks the enforcement of this Policy;
4. BOE conducts preventative training programs on child labor for its HR department, with a particular emphasis on enhancing recruitment managers' awareness of child labor issues and their ability to identify potential risks early on;
5. BOE is committed to effectively communicating this Policy to its employees and other stakeholders, including but not limited to suppliers and third-party recruitment agencies;
6. BOE ensures the public disclosure and dissemination of this Policy at the Group level, and displays it prominently in the workplace. This guarantees that employees are well-informed about the provisions of this Policy, thus facilitating the reporting of any violations;
7. BOE actively monitors and updates this Policy to ensure compliance with Chinese laws and regulations, as well as pertinent international standards. BOE also ensures that all documents related to employment practices are retained in accordance with relevant laws and regulations.

### Remediation

In case of suspected use of child labor at a BOE facility, BOE commits to taking effective remedial actions. In collaboration with the implicated facility, the following steps will be undertaken:

1. Immediately notify the parties responsible for supporting the remediation of child labor, examine all relevant documents to verify if the children are below the minimum working age, assess their physical and mental health, and conduct interviews to fully understand their situation to ensure their safety;
2. The facility in question must immediately cease the children's work and develop a remediation plan that prioritizes the children's best interests. This plan should involve collaboration with the children, their families or guardians, or third-party organizations for children's rights to determine an appropriate remediation solution in accordance with BOE's procedures;

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3. Once the children reach the minimum working age, they should be given the chance to be re-employed at the same BOE facility, if applicable;
  4. In addition to remedial actions, BOE shall ensure that the implicated facility promptly identifies any deficiencies in its recruitment or management processes and implements a corrective action plan without delay;
  5. BOE oversees and monitors the remediation process until the child labor issue is completely resolved.

## Protection of Minor Workers

### Guiding Principles

BOE respects minor workers' right to labor and shall not exclude them from employment solely on the basis of age.

When employing minor workers, BOE is committed to ensuring that such workers do not engage in hazardous tasks within any of BOE's workplaces.

As part of the essential support for minor workers to safeguard them from harm and afford them career growth opportunities, BOE undertakes the following measures:

1. BOE strictly complies with all legal requirements related to the employment of minor workers, as outlined in the Law of the People's Republic of China on Protection of Minors and the Labor Law of the People's Republic of China;
2. BOE reasonably assigns roles and responsibilities to minor workers to prevent them from night shifts, overtime work, or hazardous activities;
3. BOE ensures that the working hours of minor workers do not conflict with their compulsory educational commitments;
4. BOE acknowledges the unique needs of minor workers and enforces the above protective measures;
5. BOE provides necessary training on occupational health and safety for minor workers, establishes channels for complaints, and regularly conducts health checks.

### Remediation

If a minor worker is identified in a hazardous role, BOE will immediately initiate corrective actions. These include moving the minor away from the risky position, conducting medical examinations, providing information and training on the dangers of hazardous work, and facilitating a transition to more appropriate roles.

In cases where the health and welfare of a minor worker are at risk, BOE assures that designated internal staff oversee and monitor the remediation process. Moreover, relevant workplaces are required to implement corrective measures to prevent minors from engaging in dangerous tasks.