

BOE Human Rights Policy

Purpose

BOE Technology Group Co., Ltd. ("BOE" or the "Group") aspires "to become one of the most respectable companies on Earth." Central to its values, the Group upholds human rights and is committed to nurturing the growth and development of individuals. BOE Human Rights Policy (this "Policy") is developed to ensure that BOE earnestly upholds human rights, aligning its practices with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

Scope of Application

This Policy governs the labor and human rights protection of BOE and its subsidiaries. Each business unit or organization is authorized to formulate their own applicable guidelines within the confines of this Policy, based on their actual conditions. Furthermore, BOE actively encourages and supports its supply chain partners in adopting comparable policies to advance the protection of human rights.

Fundamental Principles

BOE commits to upholding internationally recognized human rights as set forth in the following documents:

- Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, The Convention on the Elimination of All Forms of Discrimination against Women, Convention on the Rights of the Child, etc.;
- ILO Declaration on Fundamental Principles and Rights at Work, Fair Recruitment Initiative, etc.

Areas of Focus

Working Hours and the Right to Rest

BOE upholds its employees' rights to rest, ensuring that its policies regarding working hours and overtime are in strict compliance with local laws and regulations. BOE pledges adherence to the conventions set forth by the International Labour Organization (ILO), covering standard weekly working hours, specified working durations, and mandated rest intervals. Overtime is strictly voluntary and compensated in alignment with local laws. BOE provides its workforce with sufficient rest, including weekly days off and official holidays, as mandated by laws.

Wages and Benefits

Acknowledging the intrinsic link between reasonable working hours and a decent standard of living, BOE's approach to salary management adheres rigorously to national and regional laws, taking into account the

fluctuations of the market. Committing to a remuneration philosophy that rewards individuals based on their role, skill set, and performance, BOE guarantees its employees a compensation package that not only meets but exceeds the minimum wage requirements prescribed by national policies and legislation, and remains competitive within the industry. This strategy ensures adequate provision for the basic living requirements of employees and their families, promoting an atmosphere of positive, standardized, and transparent remuneration practices. BOE's internal policies are developed in accordance with applicable local laws concerning minimum wage, overtime pay, and statutory benefits, guaranteeing lawful remuneration for all employees.

Forced Labor

BOE acknowledges the risk of forced labor, particularly among its sub-suppliers. BOE strictly forbids any form of forced labor, vigilantly oversees its supply chain, and collaborates with its suppliers to eradicate behaviors identified by the International Labour Organization as indicative of forced labor, including the confiscation of workers' personal documents, the imposition of recruitment fees on workers, restrictions on workers' freedom of movement, and excessive overtime demands. Should any infringements arise, BOE commits to immediate intervention and rectification in partnership with the implicated suppliers.

Child Labor

BOE strictly prohibits all forms of child labor, employing age verification checks to mitigate the risk of child labor. BOE permits legal internships or apprenticeship programs within the workplace, provided they comply with local laws and regulations regarding minor workers.

Occupational Health and Safety

BOE rigorously adheres to laws and regulations concerning occupational health and safety, ensuring a secure and healthy work environment for all employees. BOE is committed to eliminating risks associated with all its operations, including those from work-related accidents, injuries, and health consequences—including mental health concerns—and pandemics, as well as other internal and external challenges. Furthermore, BOE develops emergency response systems to efficiently address external security concerns, such as natural disasters. BOE provides personal protective equipment to employees at no cost and regularly offers training on occupational health and safety to ensure a safe work environment.

Discrimination and Harassment

BOE is dedicated to creating an equal and inclusive workplace. BOE ensures that all employees are afforded fair developmental opportunities throughout their time with BOE, strictly prohibiting and showing zero tolerance for any type of discrimination based on gender, age, ethnicity, religious beliefs, sexual orientation, or any other reasons. BOE commits to treating all employees and business partners with respect, enforcing stringent policies to prevent and strictly prohibit any form of harassment. This includes, but is not limited to, sexual harassment, violence, disrespect, inappropriate conduct, retaliation, and corporal punishment.

Freedom of Association and Collective Bargaining

BOE guarantees employees the right to voluntarily organize and join trade unions, engage in collective bargaining, participate in peaceful assembly, and exercise other democratic rights as permitted by local laws and regulations.

Moreover, BOE encourages its employees to fully express their views, suggestions, and concerns, providing a safe environment for the expression of speech.

Supplier Responsibility

BOE acknowledges that most risks, especially significant compliance risks, reside within the sub-tiers of its supply chain. To address these concerns and enhance collaboration with its suppliers, BOE has designated specialized staff for supplier management and developed the BOE Supplier Code of Conduct, which covers five key areas: the supplier CSR (Corporate Social Responsibility) management system, labor standards, safety and occupational health, environmental practices, and business ethics. Additionally, BOE implements a comprehensive strategy to oversee and ensure supplier compliance with the Code, focusing particularly on managing key suppliers in high-risk areas to proactively prevent and address potential non-compliance issues. Particular attention is devoted to the most severe risks, including issues related to child labor, minor and female workers, forced or compulsory labor, working and rest hours, and anti-discrimination policies and measures. BOE is committed to responsibly sourcing the materials and services used in its products and expects its suppliers to maintain these same high standards.

Information Privacy and Security

BOE recognizes the protection of personal privacy as a fundamental human right and is dedicated to standardizing and enhancing the transparency of its privacy safeguards. BOE strives to ensure robust privacy and information security management for its employees, clients, customers, and other stakeholders.

Stakeholder Engagement

BOE believes that the involvement of all stakeholders and the diversity of perspectives are essential for enhancing mutual understanding and deepening cooperation. This is crucial for BOE's active efforts in advancing human rights protection and achieving significant milestones. Therefore, BOE is dedicated to maintaining open and straightforward communication with its stakeholders, including employees, suppliers, shareholders, governments, and investors. After listening to their opinions and suggestions, BOE aims to incorporate this feedback thoughtfully into its operations.

Guiding Principles

Policy Formulation

All policies related to human rights at BOE (see Appendix) reflect the Group's respect for and commitment to human rights. Within these documents, BOE outlines its expectations for all employees, business partners, and other stakeholders, along with its strategies for honoring these commitments. BOE's human rights policies are based on international conventions and standards and are regularly assessed and updated, taking into account the internal requirements, external human rights risks, and industry developments.

Complaints and Remediation

BOE is committed to rigorously preventing any direct or indirect involvement in human rights abuses within its business operations. If violations occur that directly or indirectly lead to real negative impacts on individuals or groups, whether fully or partially due to BOE's actions or inactions, the Group undertakes to immediately investigate such claims. Moreover, BOE promises to implement effective and satisfactory remediation, either on its own or in collaboration with relevant stakeholders. Cases of serious human rights abuses will be reported to BOE's senior management for discussion. To avert future instances, BOE will investigate the root causes and adapt its management systems, procedures, and practices accordingly.

In cases where a supplier causes or contributes to adverse impacts, BOE will urge the supplier to provide mediation for the impacted workers or individuals, and follow up on the execution of such mediation. Within a feasible scope, BOE commits to working with suppliers and business partners to correct non-compliant actions and to offer guidance and support concerning their operations.

In accordance with the UNGPs, BOE maintains various channels for complaints and feedback, enabling complaint submission, ensuring prompt follow-ups, keeping complainants updated on the progress of their complaints, and promoting similar management standards among all business partners.

Disclosure and Reporting

BOE actively engages in transparent disclosure and exchange through various channels, both internally and externally, on a regular basis. This communication explains how BOE fulfills its responsibility to respect human rights, its policy commitments, and the measures it has implemented to enhance and reinforce human rights protection. These practices enhance BOE's accountability towards both internal and external stakeholders. Additionally, they help establish a feedback loop with external parties, who assess BOE's disclosures and interact with the Group to support its efforts to improve performance.

Stakeholder Engagement

BOE recognizes the impact of its business activities on local communities and individuals. Therefore, BOE is committed to maintaining open, positive, and straightforward communication with its stakeholders as part of its effort to promote human rights within its business operations. To achieve this, BOE engages with a broad spectrum of stakeholders, including those who might be directly affected by its operations—namely employees, suppliers, local communities, customers, shareholders, governments, investors, international organizations, and civil society activists. BOE listens to their perspectives, actively engages with them, learns from their insights, and integrates their feedback into its business practices.

Appendices: BOE's Policies and Guidelines on Human Rights Protection

BOE Human Rights Policy

BOE Anti-Discrimination and Anti-Harassment Policy

BOE Child Labor Prohibition Policy

"The Management Regulations of BOE Supplier's Corporate Social Responsibility"