

Statement of Human Rights Policy of Avary Holding (Shenzhen) Co., Ltd.

Our Promise

We are committed to respect human rights and to ensure ongoing identification, monitoring and management of human rights risks. All of our operation sites comply with applicable local labor laws and employment regulations. We are also committed to follow the principles of the United Nations' Universal Declaration of Human Rights, the United Nations International Covenant on Civil and Political Rights, the United Nations' International Covenant on Economic, Social and Cultural Rights, the International Labor Organization (ILO) Conventions, the Responsible Business Alliance (RBA) Code of Conduct, and UN Guiding Principles for Business and Human Rights (UNGPs).

Avary adopted its first Human Rights Policy in 2021 and has committed to regularly review, evaluate and update its strategies, management and due diligence processes. This latest update streamlines and clarifies principles that Avary upholds, and details our overall approach to embedding respect for human rights across our global operations and value chain.

Avary voluntarily complies with and collects information on all social laws of relevant authorities as well as customer requirements to ensure that we identify and address any potential human rights issues at all our global operation sites. Avary takes additional due diligence measures to ensure that all employees are voluntary and strictly prohibits any form of forced, prison or compulsory labor. In addition, Avary establishes unobstructed employer-employee communication channels to provide an effective grievance mechanism. We initiate immediate investigation procedures and implement relevant remediation measures in any situation of human rights violations. At the same time, we have established the "Supplier Social Responsibility Code of Conduct" to ensure that our supply chain partners (including contractors) work together to protect human rights.

Scope of Statement

This policy applies to all employees, subsidiaries, business partners, suppliers, and contractors of Avary Tech. Group.

Basic Principles

- **A safe and healthy work environment**

Each operation site complies with labor and environmental laws and regulations set by the local competent authorities to ensure reasonable working conditions, as well as a safe and healthy working environment for our employees.

- **Prohibition of forced labor, and human trafficking, and child labor**

Forced or compulsory labor, human trafficking, and child labor are strictly prohibited. This includes

work carried out involuntarily and through coercion due to intimidation, penalty, violence, including by security forces, restriction of movement, withholding wages, retention of identity or travel permits, or any threat of being disadvantaged.

All employment relationships at Avary and its value chain are based on voluntary participation. Employees may terminate their employment at any time with reasonable notice.

- **Equal employment, anti-discrimination, equal pay for equal work**

Avary has a zero-tolerance policy for any form of discrimination. We are committed to creating and providing equal work opportunities and ensuring equal pay for equal work. No employee or applicant will be discriminated against on the basis of nationality, race, ethnicity, skin color, age, gender, gender identity, disability, pregnancy status, marital status, religion, political affiliation, and union status. In addition, we have implemented a gender pay equality policy to ensure that individuals of all genders receive equal compensation for work of equal value.

- **Zero violence and humane treatment in the workplace**

Any form of violence or harassment, including sexual harassment, sexual abuse, physical punishment, physical or mental coercion, verbal abuse, and threats are strictly prohibited.

- **Freedom of association and collective bargaining**

By providing a workplace where our employees can freely express, share concerns or make suggestions, everyone has the right to form and join (or not join) union groups. We also respect employees' rights to bargain collectively and to engage in peaceful assemblies in accordance with related regulations. If layoffs occur due to economic reasons or termination is due to an employee's health or capability, we will provide a 30-day advance notice in accordance with the law.

- **Working hours**

Working hours shall not exceed the maximum set by local laws or 60 hours per week (including overtime), except for emergencies or particular circumstances. Employees shall be allowed at least one day off every seven days. We monitor working hours and enforce limits through our HR system, aiming to minimize overtime. All overtime or extended working hours must be voluntary.

- **Living wage and benefits**

Employee compensation shall comply with local wage laws and meet regional living wage standards to cover living needs. In addition, the company ensures employee rights in accordance with applicable laws, including payment for overtime hours, various bonuses, and provision of leave entitlements such as national holidays, paid annual leave, marriage leave, bereavement leave, maternity check-up/maternity leave, paternity leave, and parental leave.

- **Value chain responsibility**

We expect our suppliers to share the same business mission and to operate in accordance with Avary's principles and requirements, as applicable. (e.g., Supplier Code of Conduct).

- **Effective Grievance Mechanism and Remediation**

To effectively prevent and remediate adverse human rights impacts, we commit to ensuring access to grievance mechanism for workers and all stakeholders.

We provide an open platform through various communication channels to initiate an investigation process immediately upon receipt of a complaint, and to develop improvement plans and implement remedial measures to reduce risks in the event of human rights violations. We will treat the identity of the complainant and the content of the complaint confidentially and prohibit any discrimination, retaliation, threat or harassment of the complainant.

Internal communication: Employee Service Center, suggestion boxes, and Care Hotline

External communication: whistleblowing email: avary@avaryholding.com; whistleblowing website (www.avaryholding.com/contact.aspx); and whistleblowing hotline: +86-0755-33818183

We proactively provide and share information on how to access available grievance mechanisms throughout our organization and to our suppliers to ensure that our employees and other stakeholders are aware of how to submit any grievances, complaints or suggestions.

Governance

The Corporate Governance, Sustainability and Nominating Committee constituted by our Board members is committed to continuously enhance and uphold human rights by conducting regular reviews on Avary's overall operations, social responsibility, and environmental, safety and health performance.



Chairman