



Human Rights Policy

Purpose

Respect for human rights is a key enabler for achieving the United Nations Sustainable Development Goals. In March 2024, Delton Technology released its Human Rights Policy for the first time, aiming to continuously improve with internal and external stakeholders, jointly promote the practice of human rights, and build a more just and inclusive business environment.

Scope of Policy

This policy applies to all directors, officers and employees of DELTON TECHNOLOGY (GUANGZHOU) INC. and its subsidiaries, as well as business partners.

Our Principles & Positions

Delton Technology is committed to respecting human rights, supporting and abiding by the United Nations Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the United Nations Convention on the Rights of the Child, the United Nations Convention on the Elimination of All Forms of Discrimination against Women, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the Eight Basic Conventions of the International Labor Organization, and the Children's Rights and Business Principles proposed by the United Nations Global Compact, UNICEF and Save the Children and other relevant international standards and the relevant legal requirements of the countries in which they operate. Respect the legal rights and uphold ethical standards, including but not limited to colleagues in our various business units, but also those in the neighboring community, suppliers and others who may be affected by the use of our products and services. Delton Technology mainly focuses on the following aspects:

(1) Diversity, Equity & Inclusion

Delton Technology is committed to maintaining a fair and respectful working environment, respecting the personal dignity and democratic rights of workers, and protecting their rights to freedom, equality and protection in accordance with the law. Inhumane behaviors such as threatening or committing



violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, and bullying against employees are strictly prohibited.

Delton Technology prohibits discrimination on the basis of race, age, gender, sexual orientation, race or nationality, physical or mental disability, pregnancy, religion, trade union membership, etc., including benefits, job arrangements, training opportunities, promotion opportunities, etc.

(2) Health and safety

Delton Technology is committed to continuously improving the performance of its occupational health and safety management system. We provide our employees with a healthy and safe working environment in compliance with national laws, the Responsible Business Alliance (RBA) Code of Conduct, ISO 45001, and other applicable regulations and standards. Regular workplace risk assessments are conducted, and necessary preventive measures are taken to eliminate hazards, thereby reducing related accidents, injuries, and illnesses.

Delton Technology provides all employees with pre-employment and regular health and safety training to ensure they understand and master workplace safety procedures, emergency measures, and the proper use of personal protective equipment.

Delton Technology will obtain and maintain ISO 45001 certification as a standard management requirement for all its eligible companies and subsidiaries.

Delton Technology strictly protects the privacy rights and personal information security of workers. Unauthorized collection, use, or disclosure of personal information is prohibited.

Delton Technology guarantees the right of employees to rest in accordance with the law, and the working hours do not exceed the maximum time stipulated by local laws, and employees are not forced to work overtime.

(3) Training and development, salary and benefits

Delton Technology has a mature talent training system, through theoretical learning, work practice and project research and research under the guidance of professional mentors, to help employees continuously improve their professional skills and achieve personal career goals.



Delton Technology strictly abides by all applicable wage laws and regulations to ensure fair and competitive remuneration to employees. and provide comprehensive benefits plans, including but not limited to social insurance, equity incentives, and paid time off, among others.

(4) Child labor and forced labor

Delton Technology complies with all applicable laws and regulations regarding the minimum working age, prohibits the use of any form of child labor at any stage of production, and takes effective measures to avoid misemployment of child labor. Vulnerable groups such as women and juvenile workers are guaranteed the legitimate rights and interests of them in accordance with the law, and that they do not engage in work that may endanger their health or safety.

In order to ensure that the age is appropriate, the legitimate rights and interests are guaranteed, and the health and academic performance of adolescents are not affected, Delton Technology encourages students to provide corresponding jobs and training programs.

All work of Delton Technology must be carried out on a voluntary basis, and no form of forced labor is allowed, including but not limited to debt bondage (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or human trafficking. It is forbidden to transport, harbor, recruit, transfer, or receive persons for labor or services by means of threat, force, coercion, abduction, or fraud. Employees are free to leave or terminate their employment without penalty, upon reasonable notice.

(5) Communication mechanisms and freedom of association

Delton Technology has built an open and transparent communication mechanism, and adopted a multi-level and multi-faceted mechanism to build a democratic communication platform for employees according to the “Complaints, Grievance Handling and Feedback Management Procedures” document formulated by the company, and employees can feedback and communicate with the company through channels such as suggestion boxes, employee representatives, electronic complaint emails, complaint telephones, and direct complaints to the management.

Delton Technology respects the right of all employees to voluntarily form and join trade unions, engage in collective bargaining, and refuse to participate in such activities, and ensures employees’ right to speak and represent.



(6) Due diligence

Delton Technology implements human rights due diligence throughout its value chain. By integrating the OECD Due Diligence Guidance for Responsible Business Conduct into our internal audit procedures and aligning with RBA audit certification requirements, we embed responsible business practices into our policies and management systems. We regularly identify and assess potential human rights risks, implement preventive and mitigation measures, and maintain tracking mechanisms to address risks and prevent human rights infringements.

Policy Issuance and Review

This policy has been reviewed and approved by the General Manager of Delton Technology Group, and its implementation will be subject to ongoing supervision. Following its issuance, the ESG Office and the Human Resources and Administration Center will conduct periodic reviews and revisions based on changes in the external environment, laws, regulations, and other relevant factors. Any amendments shall be released after review and approval by the Group General Manager.

Whistleblowing and investigation processing

Delton Technology has established a sound consultation and reporting channel, and has carried out comprehensive protection for whistleblowers. If any personnel find possible human rights violations and risks, they can give feedback or report to the company according to the company's "Complaints, Grievance Handling and Feedback Management Procedures". Delton Technology is committed to carefully investigating all reports and protecting the privacy of whistleblowers to ensure that they are not subject to any form of retaliation.