

尊敬的 Balbin 女士：

您好！

非常感谢您于2021年3月12日来函表示对我司人权议题的关心。

人权，是全球关注的焦点，更是企业必须重视的课题，身为全球PCB产业领导品牌，严格遵守国际人权规范、尊重及促进人权，更是责无旁贷。臻鼎及子公司明订禁止任何强迫劳动、任意拘留、人口贩运、禁用童工等侵犯劳动人权行为，持续严格落实人权相关政策及管理文件，以防止任何侵犯劳动人权的行为发生。感谢您提供机会让我们说明公司的人权相关政策、执行成果以及防止任何侵犯劳动人权行为发生的做法。

贵单位于信中提及的『鹏鼎控股(深圳)股份有限公司』(2018年深圳交易所上市，[代号002938](#))，为臻鼎科技控股股份有限公司之子公司，臻鼎科技控股股份有限公司为台湾上市公司([代号4958](#))，本公司对于人权政策有严格规范，[辖下子公司包含](#)：鹏鼎控股(深圳)股份有限公司、宏启胜精密电子(秦皇岛)有限公司、宏恒胜电子科技(淮安)有限公司、庆鼎精密电子(淮安)有限公司)等，必须遵循母公司政策，母公司也会督导并稽核子公司确实执行，所以本信由母公司臻鼎科技控股股份有限公司统一回复。

臻鼎及子公司在遵循《联合国世界人权宣言》、《联合国全球盟约》、《联合国工商企业与人权指导原则》、《责任商业联盟行为准则》等基本人权原则，以及全球各运营据点所在地之法令法规下，制定《臻鼎科技控股人权政策》，并在公司官网宣言揭露([人权政策声明](#))；为贯彻落实人权政策，我司制定人权相关管理文件，依国际人权相关法规、《责任商业联盟行为准则》、《中华人民共和国劳动法》和《中华人民共和国劳动合同法》等法律法规招聘与任用员工，并开展全员人权相关培训、建立多渠道沟通与申诉机制、每年在公司年报及[企业社会责任报告书\(CSR\)](#)中揭露有关人权执行成果，充分保障员工权益，以防任何侵犯人权行为；同时国际与国内客户每年委托第三方机构来我司进行社会环境责任(SER)审核，2018~2020年亦迎来RBA(Responsible Business Alliance)对我司进行「验证稽核流程」(VAP-Validated Audit Process)，查核结果(分数与结果于附件第四部分有详述)均无任何有关强迫劳动、任意拘留、人口贩运等侵犯人权的情事发生。我们各厂区未来持续依照RBA报告有效性(通常为每两年一次)进行有效稽核并不断优化与改进。

我司制定《供应商社会责任作业办法》，将社会责任理念与要求延伸至供应链，联合供应商共同管理，要求供应商遵守并签署《厂商承诺书》，承诺书内容涵盖道德行为、保护人权等SER要求，确保各项作业均能符合SER规范，并透过举办供应商大会、供应商审核，持续倡导社会责任管理要求，推动供应链共同进步。(关于我司人权政策规范及落实，详见附件。)

我司持续秉持国际人权相关原则，恪守执行《臻鼎科技控股人权政策》，推动并落实内控程序，至于贵单位信中指出鹏鼎可能涉及维吾尔族及新疆其他少数民族的强迫劳动、任意拘留、人口贩运等情事，并未于鹏鼎发生，因为我司依《中华人民共和国劳动法》、《中华人民共和国劳动合同法》直接与所有员工签订劳动合同、给付薪资(每月发薪日发放电子薪资单)、奖金及相应福利，没有任何强迫性劳动，员工亦可根据本人意愿提出离职。我司每年将人权执行成果于公司**CSR报告书**中向社会揭露，并接受客户、员工、供应商、股东等利害关系人监督，且加入国际知名并具公信力的第三方推动企业永续的机构-RBA(Responsible Business Alliance)、BSR(Business for Social Responsibility)成为会员并密切合作，积极采纳所有有利于完善我司推动人权保护政策的改善意见，以确保我司持续在人权政策、人权尽职调查落实及相关信息揭露更加精进，以确认、防止和缓解任何潜在人权负面风险及影响，并随时响应此议题任何后续可能，以防违反人权的情况发生。

最后，再次感谢您对我司人权议题的关心！

臻鼎科技控股股份有限公司董事长

沈慶芳

沈庆芳 谨启

2021/05/05

## 『 附件 』

臻鼎科技控股股份有限公司人权政策、人权管理文件、落实执行及追踪查核，说明如下：

### 一、公司人权政策：

公司订定人权政策以保障现职员工权益，亦期许我们的供应商及商业合作伙伴恪遵下列原则以共同维护人权：

1. 遵守营运据点当地劳动及环境之相关法规，以确保员工拥有合理的工作条件及安全健康的工作环境。
2. 禁止强迫劳动及禁用童工
3. 提供平等的工作机会，不因种族、民族、年龄、性别、性别认同、残疾、怀孕、婚姻状况、宗教、信仰、政治立场等因素而有差别对待。
4. 尊重员工隐私权与员工结社自由之权利
5. 建立多元畅通的沟通渠道，提供申诉机制，如有违反人权事宜，实时进行调查程序并执行补救与改善措施。
6. 定期检视及评估相关人权政策及作为

### 二、公司人权政策管理与执行：

为贯彻落实人权政策，我司于2010年起运行SA8000(Social Accountability 8000 International Standard)管理体系，制定《社会责任管理手册》、《员工手册》、《人性化管理作业办法》、《直接人力招募作业办法》、《员工任用管理操作系统》、《工作时间与员工加班作业办法》、《员工咨询投诉管理作业办法》等管理文件，依国际人权相关法规、《责任商业联盟行为准则》、《中华人民共和国劳动法》和《中华人民共和国劳动合同法》等法律法规，合法合规招聘与任用员工，并充分保障员工各项合法权益，说明如下：

#### 1. 招聘原则与作业：

1.1 招募原则：我司招募员工时秉持公开透明、诚信、廉洁、不歧视、守法、自愿原则，不因民族、种族、宗教、政治立场等因素有任何歧视，禁止以任何强迫或欺骗手段雇佣员工，禁止任何直接或间接使用囚工、强迫性劳工、奴役、抵债、契约劳工及贩卖人口。

#### 1.2 招募作业：

- a. 招聘管道：我司使用内部员工推荐、工厂所在城市劳动力市场(企业招聘和求职者之聚集地)、企业招聘APP(我司自主开发的招聘APP，任何人可透过此APP推荐或自荐入职)招聘渠道公开发布招募广告，招聘广告或许会被各类平台或媒体转发出去，但从未通过政府渠道招工。
- b. 求职者：有多种方式得知我司招聘广告，包括内部推荐、工厂所在城市劳动力市场、企业招聘APP或其他平台。
- c. 招聘执行：严格依照《直接人力招募作业办法》、《员工任用管理操作系统》等管理文件执行，合法合规进行招聘。
- d. 人权培训：我司人力资源招聘人员定期进行人权政策培训，考核合格方可上岗。
- e. 求职意愿调查：所有求职者在面试登记时，均有书面调查工作意愿，人力资源部招聘人员也会面谈求职者是否自愿应聘，以确保招聘自愿原则落实执行。
- f. 结语：我司始终秉持公开透明、守法、自愿等原则，严格按照公司管理文件执行招募作业及求职意愿调查，确保所有员工自愿入职，以防任何强迫劳动的情况发生。

## 2. 员工任用原则与作业：

### 2.1 任用原则：

- a. 禁止歧视：我司鼓励所有员工平等相处，禁止一切形式的歧视，不因民族、种族、年龄、性别、性别认同、残疾、怀孕、婚姻状况、宗教、信仰、政治立场等在招聘、培训、升职、奖励、工资、处罚等过程中予以歧视。
- b. 禁止惩戒性管理：我司实行人性化与弹性化管理方式，尊重员工的人格与尊严，防止任何形式的惩戒性管理。
- c. 禁止强迫性劳动：
  - (1) 招募管理：以自愿为原则，禁止以任何强迫或欺骗手段雇佣员工，禁止收缴求职者证件。
  - (2) 工时管理：加班遵循自愿原则，在员工上班工作期间允许有合理的休息时间。
  - (3) 行动自由：除为保障员工健康安全外，不得在工作场所及员工宿舍中强制实施行动限制。
  - (4) 请假与休息管理：公司允许员工因各种原因请假，如婚假、产假、病假、有薪年假、事假等，员工可以自由支配休息时间。
  - (5) 离职管理：员工离职提前30天(试用期内提前3天)以书面形式申请，可以解除劳动合同。

### 2.2 任用作业：严格按照《员工手册》、《员工任用管理操作系统》、《工作时间与员工加班作业办法》、《员工离职作业办法》、《人性化管理作业办法》等管理文件落实员工任用政策，重点说明如下：

- a. 劳动合同：严格依照法令规定，基于公平公正及自愿原则，员工入职即与公司签订劳动合同；员工离职提前30天(试用期内提前3天)以书面形式申请，可以解除劳动合同。
- b. 工作时间管理：我司员工正常工作时间为每天8小时、每周正常工作5天，法定节假日的工作时间及超出正常工作时间的工作时间视为加班，所有加班均为员工自愿申请，不得以任何形式强迫加班，并依法支付加班费或提供补休。
- c. 薪资发放：每月7日(含)前依法支付薪资，发薪日会发放电子薪资单给每一位员工，同时依法为所有员工缴纳五险一金，保障合法薪酬福利。
- d. 员工离职：员工可以按本人意愿提出离职申请，依《员工离职作业办法》办理离职手续，离职员工工资依法令规定发放。

## 3. 人权保障培训：

为了让员工具备人权意识及人权知识，我司通过教育训练方式向员工和各层级主管传达人权政策相关的知识，确保充分了解人权政策，具体如下：

- 3.1 训练内容：新进员工在入职培训时均会进行人权政策与知识培训，所有在职员工均会发放《员工手册》及人权政策卡片，并每年至少进行人权政策与知识培训1次；训练内容包括禁止强迫劳动、禁止童工、反歧视、反骚扰、工时管理、薪资和福利、自由结社、人道待遇、沟通与申诉渠道、职业安全及管理體系等。
- 3.2 训练实施：2020年人权保障训练总时数逾50万小时，员工100%完成人权相关培训，公司将持续推动相关教育训练，以提高人权保障意识。

### 三、员工申诉机制：

为协助员工解决工作、生活中的困惑，让员工可随时反映各类问题，共同营造乐于沟通的和谐工作环境，公司拟定《员工咨询投诉管理作业办法》并贯彻实施，在内部建立多渠道沟通机制，外部亦有政府机关作为员工自由申诉与沟通的管道，具体如下：

#### 1. 内部机制：

- a. 申诉与沟通管道：公司设有员工座谈会、意见箱、员工服务中心、关爱热线、申诉邮箱、工会等多个畅通有效的沟通渠道，让员工可随时反映各类问题，包括人权相关的申诉。旨在收集公司存在的问题点并纠正、改善，协助员工解决工作、生活中的各类问题，提升员工满意度。
- b. 各管道宣传方式：我司通过对新人及在职员工进行人权课程培训、海报张贴宣传等方式，确保公司管理干部与员工均清楚知悉申诉与沟通管道。
- c. 实名与匿名申诉：公司接受员工各类实名或匿名申诉，均会依《员工咨询投诉管理作业办法》做好登记、处理与结果反馈。
- d. 申诉者保密原则：为保障申诉员工利益，在调查处理进程中，公司对申诉者身份保密，仅由接待责任人保管，充分保障申诉者合法权益，确保不被打击报复。
- e. 2020年执行记录：公司内部沟通渠道共收到员工意见箱2件，员工服务中心83件，关爱热线24件，申诉邮箱6件；所有申诉案件已由责任单位处理，处理结果及时回复申诉者，确保员工申诉的问题得到有效解决，以提高员工满意度，营造和谐劳资环境。2020年收到115件员工申诉中，均未涉及任何形式的强迫性劳动、歧视、限制人身自由等负面人权影响。

#### 2. 政府机关：

我司员工有任何诉求均可依法向政府劳动及监察等机关申诉，如当地政府劳动及监察等机关有收到员工申诉，亦会立即与我司联系，至今从未接到政府劳动及监察等机关对我司有任何侵犯人权的反馈或调查。

#### 四、执行成效评核：

为确保员工基本人权，恪守各运营据点所在地之法令法规，公司成立「社会与环境责任委员会(SER Committee)」，其管理职责涉及人权保护、道德规范和管理系统等。SER Committee明确制定委员会任务及其委员职权与职责，拟定相关政策和绩效目标，追踪实施计划，定期评估及检讨等。委员会每年度主动检视内部制度是否符合最新RBA准则，以彻底落实电子行业行为准则之规定，并透过RBA Online官方网站进一步进行内部风险度评估，以避免强迫性劳动、歧视、虐待、限制人身自由等侵犯人权的行為发生。

1. 臻鼎子公司位於深圳、淮安、秦皇島的各大园区，近三年的SAQ(Self-Assessment Questionnaire)分数均高于90分(满分100分)。除了内部自我检视机制外，我司亦接受客户委托之第三方机构执行RBA「验证稽核流程 (VAP)」，透过外部稽核之角度，进一步发现可持续优化改进之处。鹏鼎控股(深圳)、淮安第一园区(宏恒胜)与第二园区(庆鼎)均已完成VAP评鉴，分别获得164.4分、173.8分及187.2分的成绩(满分200分)，且无任何强迫性劳动、歧视、虐待、限制人身自由等侵犯人权政策之事实。未来我司将定期(通常为每两年一次)执行RBA VAP，确保人权政策与执行持续精进与优化；近三年执行情况如下：

法人	项目/年度	SAQ			VAP				风险
		2018	2019	2020	2018	2019	2020	2021	
鹏鼎控股(深圳)股份有限公司		92.3	93.2	92.7	164.4	-	-	预约审核中	Low
宏启胜精密电子(秦皇島)有限公司		93.5	93.4	94.0	-	-	-		Low
宏恒胜电子科技(淮安)有限公司		94.3	94.3	94.4	-	-	173.8	-	Low
庆鼎精密电子(淮安)有限公司		95.0	94.9	94.5	-	-	187.2	-	Low

2. 公司历年接受国内外客户到公司进行SER年审，均顺利通过，且无任何强迫性劳动、歧视、虐待、限制人身自由等侵犯人权政策之事实；近三年客户审核成绩如下：

年度	法人	鹏鼎控股		宏启胜		庆鼎		宏恒胜	
		客户A	客户B	客户A	客户B	客户A	客户B	客户A	客户B
2018		/	/	低风险	/	低风险	/	/	/
2019		低风险	/	低风险	/	低风险	/	/	/
2020		低风险	低风险	低风险	低风险	/	低风险	/	低风险

Zhen Ding Technology Holding Limited  
No. 6, Lane 28, Sanho Road,  
Sanshi Village, Dayuan District, Taoyuan,  
Taiwan, R.O.C.

<https://www.zdtco.com>

5 May 2021

Via Email registry@ochcr.rog

Ms. Beatriz Balbin

Chief, Special Procedures Branch

Office of the High Commissioner for Human Rights

Response to Correspondence Dated 12 March 2021 REFERENCE: AL OTH 69/2020

*Zhen Ding official English translation from original Chinese correspondence*

Dear Ms. Balbin:

Greetings!

Thank you very much for your letter dated 12 March 2021 to Mr. Qing Fang Chen of Avery Holding Co., Ltd. regarding concerns over the issue of human rights at our company.

Human rights is the focus of global attention, and an issue that enterprises must give due consideration to. As a leading manufacturing service solution provider and brand in the global PCB industry, we at Zhen Ding Technology Holdings are duty-bound to abide by international human rights norms, and to respect and promote human rights. Zhen Ding and its subsidiaries explicitly prohibit any violations of human rights, including forced labor, arbitrary detention, human trafficking, and child labor. We also strictly implement human rights related policies and management documents to prevent any violations of human rights. Thank you for providing us with the opportunity to explain the company's human rights-related policies, implementation results, and practices for the prevention of human rights violations.

"Avery Holding (Shenzhen) Co., Limited" mentioned in your letter (listed on the Shenzhen Stock Exchange in 2018, [\(Code 002938\)](#)) is a subsidiary of Zhen Ding Technology Holding Limited, which is a listed company in Taiwan [\(Code 4958\)](#). The company has strict regulations on human rights policies, [\(Subsidiaries list can be found hear\)](#) and all subsidiaries including Avery Holding (Shenzhen) Co., Limited, Hong Qi Sheng Precision

Electronics (Qinhuangdao) Co., Ltd., Hong Heng Sheng Electronical Technology (Huaian) Co., Ltd., and Qing Ding Precision Electronics (Huaian) Co., Ltd., etc. must abide by the parent company's policies. The parent company is also responsible for supervising and auditing the actual implementation of such policies by subsidiary companies, therefore this letter is responded to by the parent company Zhen Ding Technology Holding Limited.

Zhen Ding and its subsidiaries, in compliance with basic human rights principles such as the United Nations Universal Declaration of Human Rights, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the Code of Conduct of the Responsible Business Alliance (RBA Code of Conduct), as well as the local laws and regulations of its global operating sites, has formulated the "Zhen Ding Technology Holdings Human Rights Policy" and disclosed the Policy on the company's official website ([Human Rights Policy Statement](#)). In order to fully implement the Policy, our company has formulated human rights related management documents, and recruits and appoints employees in accordance with international human rights regulations, RBA Code of Conduct, "Labor Law of the People's Republic of China" and "Labor Contract Law of the People's Republic of China" and other laws and regulations. We conduct human rights related training for all employees, have established a multi-channel communication and grievance mechanism, and disclose the results of our human rights performance in the company's annual reports and Corporate Social Responsibilities Report every year to fully protect the rights and interests of employees, thus working to ensure the prevention of any violations of human rights. At the same time, our international and domestic customers entrust third-party organizations to perform social and environmental responsibility (SER) audits at our company every year. The RBA furthermore conducted "VAP-Validated Audit Processes" on our company from 2018 to 2020, and the results of the audit (scores and results are detailed in the fourth part of the appendix) did not indicate any violations of human rights related to forced labor, arbitrary detention, and human trafficking, etc. In the future, our production sites will continue to conduct effective audits and engage in optimization and improvement in accordance with the effectiveness of the RBA report (usually once every two years).

Our company formulated the "Supplier Social Responsibility Operating Measures", which extends the concept and requirements of social responsibility to the supply chain for joint management with our suppliers. We require suppliers to abide by and sign the "Vendor Commitment Letter", which covers ethical behavior, protection of human rights and other SER requirements to ensure that all operations fulfill SER specifications. We also continue to advocate social responsibility management requirements through the organization of supplier conferences and supplier audits to promote the common progress of the supply chain. (For the specifications and implementation of our human rights policy, see the attachment for details.)

Our company continues to uphold the principles of international human rights, strictly abide by the "Zhen Ding Technology Holdings Human Rights Policy", and promote and implement internal control procedures. With regard to the letter from your organization indicating that Avary may be involved in forced labor, arbitrary detention, human trafficking and other incidents of the Uyghur people and other minority ethnic groups in Xinjiang, the above have not occurred at Avary as our company directly recruits our employee, signs labor contracts with, pay wages to (electronic payslips are issued on the payday of each month), and issues bonuses and corresponding benefits to all employees in accordance with the "Labor Law of the People's Republic of China" and "Labor Contract Law of the People's Republic of China"; there has been no instances of forced labor, and employees can also submit resignations according to their personal intent.

Our company publicly discloses the results of human rights enforcement in the company's [CSR report](#) every year, accepts the supervision of stakeholders such as customers, employees, suppliers, shareholders, etc., and is an active member in internationally renowned and credible third-party organizations that promote corporate sustainability such as RBA (Responsible Business Alliance) and BSR (Business for Social Responsibility). We actively adopt all the improvement opinions that are conducive to the improvement of our company's human rights protection policy to ensure that our company continues to be more rigorous in enforcing the human rights policy, human rights due diligence implementation and related information disclosure. This will enable us to confirm, prevent and mitigate any potential negative human rights risks and impacts, and respond to any subsequent possibilities of this issue at any time to prevent violations of human rights.

Finally, we thank you again for your concern over the issue of human rights at our company!

Sincerely yours,

Zhen Ding Technology Holding Limited



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Chang-Fang Shen  
Chairman of the Board

## Attachments

The Human Rights Policy, human rights management documents, and implementation and follow-up inspection of Zhen Ding Technology Holding Limited are described as follows:

### I. The company's human rights policy:

The company has formulated human rights policies to protect the rights and interests of current employees, and also expects our suppliers and business partners to abide by the following principles to jointly safeguard human rights:

1. Comply with local labor and environmental laws and regulations at operating sites to ensure that employees are entitled to reasonable working conditions and a safe and healthy working environment.
2. Prohibit forced labor and child labor
3. Provide equal job opportunities without discrimination based on factors such as race, ethnicity, age, gender, gender identity, disability, pregnancy, marital status, religion, belief, and political stance, etc..
4. Respect employees' right to privacy and their right to freedom of association.
5. Establish a diversified and unobstructed communication channel, provide a grievance mechanism, and, in the event of violation of human rights, conduct real-time investigation procedures and implement remedial and improvement measures.
6. Regularly review and evaluate relevant human rights policies and actions.

### II. Management and implementation of the company's human rights policy:

In order to fully implement the Human Rights Policy, Zhen Ding and its subsidiaries have been running the SA8000 (Social Accountability 8000 International Standard) management system since 2010. We have formulated the "Social Accountability Management Manual," "Employee Handbook," "Humanized Management Operating Measures," "Direct Manpower Recruitment Operating Measures," "Employee Appointment Management Operating System," "Working Hours and Employee Overtime Operating Measures," "Employee Consultation and Complaint Management Operating Measures" and other management documents, legally and compliantly recruit and appoint employees in accordance with relevant international human rights standards, RBA, the "Labor Law of the People's Republic of China," the "Labor Contract Law of the People's Republic of China" and other laws and regulations, and fully protect all legal rights and interests of employees, as described in the following content:

#### 2. Recruitment principles and operations:

- 2.1. Principles: When recruiting employees, our company upholds the principles of openness and transparency, integrity, honesty, non-discrimination, legal compliance, and voluntariness. There is no discrimination due to ethnicity, race, religion, political stance or other factors. The employment of employees by any coercive or deceptive means is prohibited, as is any direct or indirect use of prison labor, forced labor, slavery, bonded labor, indentured labor, and human trafficking.

## 2.2. Recruitment operations:

- a. Recruitment channels: Our company uses recruitment channels such as internal employee recommendation, the labor market of the city where the production site is located (the gathering place for corporate recruiters and job seekers), and our corporate recruitment app (a recruitment app developed by our company through which anyone can recommend themselves or others) to publicly announce recruitment advertisements, which may be forwarded by various platforms or media, but we have never recruited through government channels.
- b. Candidates: There are many ways to learn about our recruitment advertisements, including internal recommendations, the labor market of the city where the production site is located, our corporate recruitment app or other platforms.
- c. Recruitment execution: Recruitment is conducted lawfully and compliantly strictly in accordance with the "Direct Manpower Recruitment Operating Measures", "Employee Appointment Management Operating System" and other management documents.
- d. Human rights training: Our recruiters can only take up their posts after demonstrating their knowledge of their human rights and recruitment standards.
- e. Job-seeker intention surveys: All job-seekers undergo a written survey of their intent to work when registering for the interview. The recruiters of the Human Resources Department will also interview the job-seekers to assess whether they are voluntarily applying, thus ensuring that the principle of voluntary recruitment is implemented.
- f. Summary: Our company has always adhered to the principles of openness, transparency, legal compliance, and voluntariness, etc., and performed recruitment operations and job-seeker intention surveys strictly in accordance with the company's management documents to ensure that all employees voluntarily assume their positions and prevent any instance of forced labor.

## 3. Employee appointment principles and operations:

### 3.1. Appointment principles:

- a. Non-discrimination: Our company encourages all employees to view each other as equals, prohibits all forms of discrimination, and does not exercise discrimination in the processes of recruiting, training, promoting, rewarding, paying wages, or administering penalties due to ethnicity, race, age, gender, gender identity, disability, pregnancy, marital status, religion, belief, or political stance, etc..
- b. Prohibition of inappropriate disciplinary management: Our company implements humanized and flexible management methods, respects the personality and dignity of employees, and prevents any form of inappropriate disciplinary measures.
- c. Prohibition of forced labor:
  - (1) Recruitment management: Based on the principle of voluntariness, we prohibit the hiring of employees by any coercive or deceptive means, and we do not collect or hold job seekers' certifying documents except when we validate employment eligibility. Work hours management: Overtime work follows the

principle of voluntariness, and reasonable rest time is allowed during the employee's work hours.

- (2) Freedom of movement: Except to protect the health and safety of employees, no restrictions on movement have been enforced in the workplace and dormitories.
- (3) Leave and rest management: The company allows employees to take leave for various reasons, such as marriage leave, maternity leave, sick leave, paid annual leave, personal leave, etc., and employees can freely allocate their rest time.
- (4) Separation management: The employee is free to resign with 30 days notice (3 days in advance during the probation period) and applies in writing to terminate the labor contract.

3.2.Appointment operations: Employee appointment policies are implemented in strict accordance with management documents such as the "Employee Handbook," "Employee Appointment Management Operating System," "Working Hours and Employee Overtime Operating Measures," "Employee Resignation Operating Measures," "Humanized Management Operating Measures" and other management documents, with key explanations as follows:

- a. Labor contracts: In strict accordance with laws and regulations and based on the principles of fairness and voluntariness, employees sign a labor contract with the company when they join the company; employees can resign with 30 days advance notice (3 days in advance during the probation period) and apply in writing to terminate the labor contract.
- b. Work hours management: The normal working hours of employees at our company are 8 hours a day and 5 days a week. Work hours on statutory holidays and work hours that exceed normal work hours are regarded as overtime. All overtime is voluntarily applied for by employees, shall not be forced in any form, and wages for overtime are paid or compensatory time off is provided in accordance with the law.
- c. Salary payment: The company pays wages in accordance with the law before the 7th (inclusive) of each month. On the payday, an electronic payslip is issued to each employee. At the same time, five social insurances and one housing fund are paid for all employees according to the law to ensure legal compensation and benefits.
- d. Employee separation: Employees can apply for resignation according to their personal intent and undergo resignation procedures in accordance with the "Employee Resignation Operating Measures;" resigning employees receive wages according to laws and regulations.

#### 4. Human rights training:

In order to equip employees with human rights awareness and human rights knowledge, our company conveys knowledge about human rights policies to employees and supervisors at all levels through education and training to ensure that they fully understand human rights policies; specifics are as follows:

- 3.1 Training content: New employees will be trained on human rights policies and knowledge during orientation. All in-service employees are issued "Employee Handbooks" and human rights policy cards, and undergo human rights policy and knowledge training at least once a year; the training content includes prohibition of forced labor, prohibition of child labor, anti-discrimination, anti-harassment, working hours management, compensation and benefits, freedom of association, humane treatment, communication and complaint channels, and occupational safety and management systems, etc..
- 3.2 Training implementation: In 2020, the total number of human rights raining hours exceeded 500,000 hours, and 100% of employees completed human rights related training. The company will continue to promote related education and training to increase awareness of human rights.

### III. Grievance mechanism:

To assist employees in resolving misunderstandings in work and life, enable employees to report various problems at any time, and jointly create a harmonious working environment that encourages communication, the company drafted and implemented the "Employee Consultation and Complaint Management Operating Measures" and established a multi-channel communication mechanism internally. Other external channels for employees to complain and communicate freely such as government agencies are also available; specifics are as follows:

2. Internal mechanism:
  - a. Grievance and communication channels: The company has established multiple unimpeded and effective communication channels such as employee seminars, suggestion boxes, employee service centers, care hotlines, complaint mailboxes, labor unions, etc., so that employees can report various issues at any time, including human rights-related complaints and grievances. The aim is to collect information about challenges, complaints, grievances, or needs impacting employees or the company and enable the company to resolve grievances assist employees in their work and in life, and improve employee satisfaction.
  - b. Promotional methods for various channels: Through human rights training for new and current employees, posters and other methods, our company ensures that all management personnel and employees are clearly aware of the company's grievance and communication channels.
  - c. Real-name and anonymous complaints: The company accepts all types of real-name or anonymous complaints and grievances from employees, and will complete registration, handling and result feedback in accordance with the "Employee Consultation and Complaint Management Operating Measures".
  - d. Principle of complainant confidentiality: In order to protect the interests of employees that filed a complaint or grievance (the complainant), the company keeps the identity of the complainant confidential during the process of investigation and processing, and such information is kept only by the handling

personnel to fully protect the legal rights of the complainant and ensure no retaliation.

- e. 2020 implementation record: In terms of internal communication channels, the company received a total of 2 complaints through the employee suggestion box, 83 complaints through employee service centers, 24 complaints through care hotlines, and 6 complaints through complaint mailboxes; all complaint cases have been handled by the responsible unit, and the results of the processing have been responded to the complainant in a timely manner to ensure that employee complaints are effectively resolved, thus improving employee satisfaction and creating a harmonious labor-management environment. Of the 115 employee complaints received in 2020, none involved any form of forced labor, discrimination, restriction of personal freedom and other negative human rights impacts.

### 3. Government agencies:

Employees of our company can complain to the government labor and supervision agencies according to the law. If the local government labor and supervision agencies received employee complaints, they will immediately contact our company. So far, we have never been investigated for or received any feedback on human rights violations by or from government labor and supervision agencies.

## IV. Implementation effectiveness evaluation:

In order to ensure the basic labor human rights of employees, and to abide by the laws and regulations of each operating site, the company established a "Social and Environmental Responsibility Committee (SER Committee)" whose management responsibilities involve labor human rights protection, ethics and management systems. The SER Committee clearly sets the tasks of the committee and its members' powers and responsibilities, formulates related policies and performance targets, tracks implementation plans, and regularly evaluates and reviews corporate performance and opportunities to improve. The committee actively reviews whether the internal system complies with the latest RBA standards every year to fully implement the provisions of the Electronic Industry Citizenship Coalition, and further conducts internal risk assessments through the RBA Online official website to prevent human rights violations such as forced labor, discrimination, abuse, and restrictions on personal freedom from occurring.

1. Zhen Ding's subsidiaries are located in major industrial parks in Shenzhen, Huai'an and Qinhuangdao. The SAQ (Self-Assessment Questionnaire) scores of the past three years have all been higher than 90 points (out of a possible total of 100). In addition to the internal self-inspection mechanism, our company also undergoes RBA "Verification Audit Processes (VAP)" implemented by third-party agencies entrusted by customers; through the perspective of external audits, we can further discover areas requiring continuous optimization and improvement. VAP appraisals for Avary Holding (Shenzhen), Huai'an No. 1 Park (Hong Heng Sheng) and No. 2

Park (Qing Ding) have all been completed with strong scores of 164.4, 173.8, and 187.2 respectively out of a total possible score of 200; furthermore, there has been no instances of forced labor, discrimination, abuse, restriction of personal freedom and other human rights violations. In the future, our company will implement RBA VAP on a regular basis (usually once every two years) to ensure continuous improvement and optimization of human rights policies and implementation; implementation status of the past three years is as follows:

Institution \ Item/Year	SAQ			VAP				Risk
	2018	2019	2020	2018	2019	2020	2021	
Avary Holding (Shenzhen) Co., Limited	92.3	93.2	92.7	164.4	-	-	Audit sched uled	Low
Hong Qi Sheng Precision Electronics (Qinhuangdao) Co., Ltd.	93.5	93.4	94.0	-	-	-		Low
Hong Heng Sheng Electrical Technology (Huaian) Co., Ltd.	94.3	94.3	94.4	-	-	173.8	-	Low
Qing Ding Precision Electronics (Huaian) Co., Ltd.	95.0	94.9	94.5	-	-	187.2	-	Low

2. The company has undergone SER annual audits conducted by domestic and foreign customers on the company over the years, and has successfully passed all audits; furthermore, there has been no instances of forced labor, discrimination, abuse, restriction of personal freedom and other human rights violations. Customer audit results in the past three years are as follows:

Institution \ Year	Avary Holding		Hong Qi Sheng		Qing Ding		Hong Heng Sheng	
	Customer A	Customer B	Customer A	Customer B	Customer A	Customer B	Customer A	Customer B
2018	/	/	Low risk	/	Low risk	/	/	/
2019	Low risk	/	Low risk	/	Low risk	/	/	/
2020	Low risk	Low risk	Low risk	Low risk	/	Low risk	/	Low risk