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Document No.	WI_GMO_003	Date	2026/5/13
Responsibility	Enterprise Planning Dept.	第1页/共8页	

## 1.Purpose 目的

为遵循相关商业与人权指导原则，建立人权风险识别、评估、预防等管控机制，规范人权合规内外部沟通与公示流程，杜绝童工、强迫劳动、歧视、职场侵权等红线问题，保障员工合法权益与供应链人权合规，履行企业社会责任。

To comply with relevant business and human rights guiding principles, establish management mechanisms for the identification, assessment and prevention of human rights risks, standardize internal and external communication and disclosure processes for human rights compliance, eliminate red-line issues such as child labor, forced labor, discrimination and workplace infringements, protect the legitimate rights and interests of employees and ensure supply chain human rights compliance, and fulfill corporate social responsibilities.

## 2.Scope 适用范围

本程序适用于安德佳集团及下属子公司在运营过程中，对人权、履行企业社会责任、保障相关方合法权益的管理，确保在发现人权问题后，企业能够快速响应并采取有效行动。

This procedure applies to the management of human rights, corporate social responsibility fulfillment and protection of the legitimate rights and interests of relevant stakeholders during the operations of ATA Group and its subsidiaries, ensuring that the enterprise can respond quickly and take effective actions once human rights issues are identified.

## 3.Realization of process 管理流程

### 3.1 发布行为准则 Issuance of Code of Conduct

发布《安德佳员工手册》，明确零容忍红线：禁止童工、禁止强迫劳动、禁止歧视、禁止职场暴力等违规行为，政策包含全程保护申诉人信息，严禁对申诉人或意见反馈人实施降薪、调岗、等打击报复行为，政策范围覆盖安德佳集团各地员工、劳务派遣、外包、供应链，在安德佳集团厂区公告栏、

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企业微信、共享路径长期公示，明确承诺尊重人权和遵守相关国际法规。

Issue the *ATA Employee Handbook* to clarify zero-tolerance red lines: prohibit violations such as child labor, forced labor, discrimination and workplace violence. The policy includes full protection of complainant information, and strictly prohibits retaliatory actions such as salary reduction or job transfer against complainants or feedback providers. The policy covers employees, labor dispatch personnel, outsourced personnel and supply chain partners of ATA Group across all regions. It shall be permanently posted on factory notice boards, corporate WeChat and shared access paths of ATA Group, with a clear commitment to respecting human rights and complying with relevant international laws and regulations.

### 3.2 建立内部治理机制 Establishment of Internal Governance Mechanism

- 1) 任命一名人权与可持续发展负责人，负责监督、推进处理人权相关工作，汇报进度；

Appoint a person in charge of human rights and sustainable development to supervise, promote and handle human rights-related work and report progress;

- 2) 在现有管理层中设立人权合规委员会，确保委员会定期召开会议，审查人权合规情况，成员包括

以下：

Establish a Human Rights Compliance Committee within the existing management to ensure regular meetings are held to review human rights compliance status. The committee members include:

- a) 供应链负责人 Head of Supply Chain
- b) 质量管理负责人 Head of Quality Management
- c) ESG（环境、社会与治理）负责人 Head of ESG (Environmental, Social and Governance)
- d) 法务与合规负责人 Head of Legal and Compliance
- e) 高级管理层代表 Representative of Senior Management

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### 3.3 完善供应链尽职调查流程 Improvement of Supply Chain Due Diligence Process

1) 要求所有供应商签署供应商行为准则 (Supplier Code of Conduct) , 明确以下内容:

Require all suppliers to sign the Supplier Code of Conduct, specifying the following:

a) 禁止使用童工、强迫劳动和任何形式的歧视;

Prohibit the use of child labor, forced labor and any form of discrimination;

b) 符合国际劳工组织 (ILO) 的核心劳动标准;

Comply with the core labor standards of the International Labour Organization (ILO);

c) 遵守当地劳动法规和环境保护标准。

Abide by local labor laws and environmental protection standards.

2) 供应商尽职调查 Supplier Due Diligence:

a) 开展供应商背景调查, 评估其人权和环境合规性, 结果与订单量挂钩;

Conduct supplier background checks to assess their human rights and environmental compliance, with results linked to order volume;

b) 供应商违规下达整改通知, 限期整改, 整改不合格降级 / 暂停订单。

Issue rectification notices for supplier violations with a time limit for rectification; downgrade suppliers or suspend orders if rectification fails.

### 3.4 制定并执行措施 Formulation and Implementation of Measures

1) 停止: 当企业发现自身的运营活动导致或助长了对人权的侵犯时, 企业有责任立即停止导致侵权的行为并制定问题响应政策。如企业供应链中存在强迫劳动, 企业应立即终止与相关供应商的合作, 或要求供应商立即停止使用强迫劳动; 如企业某个项目对当地社区的环境或健康造成了直接威胁, 企业应暂停该项目的相关活动。

Cessation: When the enterprise finds that its own operations have caused or contributed to

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human rights violations, it shall be responsible for immediately stopping the infringing conduct and formulating a response policy for the issue. If forced labor exists in the enterprise's supply chain, the enterprise shall immediately terminate cooperation with the relevant supplier or require the supplier to immediately stop using forced labor; if a project poses a direct threat to the environment or health of the local community, the enterprise shall suspend relevant activities of the project.

- 2) 预防: 企业需通过前期的风险识别和预防措施, 避免人权侵害的发生。如入职 100% 核验身份证; 在供应商合同中明确规定禁止使用童工或强迫劳动, 防止其运营、产品或服务对人权造成潜在的负面影响。

Prevention: The enterprise shall avoid human rights violations through preliminary risk identification and preventive measures. For example, conduct 100% ID verification upon employee onboarding; explicitly stipulate in supplier contracts the prohibition of child labor or forced labor to prevent potential negative impacts of their operations, products or services on human rights.

- 3) 减缓: 如企业评估无法完全避免人权风险, 企业应采取措施减轻可能产生的负面影响。如供应链中存在一定的劳工问题, 企业可以通过培训、监督和合作改善供应商的劳工条件。

Mitigation: If the enterprise assesses that human rights risks cannot be completely avoided, it shall take measures to mitigate potential negative impacts. For example, if certain labor issues exist in the supply chain, the enterprise can improve suppliers' labor conditions through training, supervision and cooperation.

- 4) 终止: 如果企业发现其运营、供应链或商业关系中存在持续性的人权侵害, 并且无法通过其他方式解决, 企业需采取行动终止相关行为。如供应商长期存在严重的劳工剥削行为, 企业应终止与其合作, 并寻找合规的替代供应商。

Termination: If the enterprise finds persistent human rights violations in its operations, supply chain or business relationships that cannot be resolved through other means, it shall take action

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to terminate the relevant conduct. For example, if a supplier has long-term serious labor exploitation practices, the enterprise shall terminate cooperation with it and seek compliant alternative suppliers.

### 3.5 加强内外部沟通 Strengthening Internal and External Communication

#### 1) 内部沟通 Internal Communication

- a) 渠道：厂区公告栏、企业微信、车间看板、入职培训、部门例会、员工大会、工会等；

Channels: Factory notice boards, corporate WeChat, workshop display boards, onboarding training, departmental regular meetings, employee assemblies, trade unions, etc.;

- b) 内容：人权政策、零容忍红线、申诉渠道、合规要求、整改案例等；

Content: Human rights policies, zero-tolerance red lines, appeal channels, compliance requirements, rectification cases, etc.;

- c) 频次：新员工入职必培训；在职员工年度专项宣导；重大合规调整即时全员通知。

Frequency: Mandatory training for new employees upon onboarding; annual special promotion for in-service employees; immediate notification to all staff for major compliance adjustments.

#### 2) 外部沟通 External Communication

- a) 供应链端：供应商大会、年度评审会公示人权要求、合规表现、黑名单；

Supply Chain Side: Announce human rights requirements, compliance performance and blacklists at supplier conferences and annual review meetings;

- b) 客户端：客户现场审核时，提供公示材料、沟通记录；

Client Side: Provide disclosure materials and communication records during on-site audits by clients;

- c) 可持续报告：按需发布《年度可持续发展（ESG）报告》。

Sustainability Report: Issue the *Annual Environmental, Social and Governance (ESG) Report* as required.

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### 3.6 风险评估与信息公示要求

- 1) 人力资源部每年 1 次全面评估新增厂区 / 供应商 / 业务线、法规更新等发面存在的人权违规隐患；

The Human Resources Department shall conduct a comprehensive assessment of potential human rights violations in new factories/suppliers/business lines, regulatory updates and other aspects once a year;

- 2) 如发现严重人员违规应在 24 小时内上报人权管理委员会、相关方及所在地人权合规部门；

If serious personnel violations are found, report to the Human Rights Management Committee, relevant stakeholders and local human rights compliance department within 24 hours;

- 3) 人员违规事件解决后应对同类岗位 / 环节开展专项排查,防止同类问题复发,保留相关处理记录,并组织相关方进行培训。

After resolving personnel violation incidents, conduct special inspections for similar positions/links to prevent recurrence of similar problems, retain relevant handling records and organize training for relevant stakeholders.

## 4.Responsibilities 职责

- 1) 人权合规委员会：审批人权政策、制定重大风险处置方案、对外公示文件；定期召开会议，审核人权风险报告；审批供应商终止决定。

Human Rights Compliance Committee: Approve human rights policies, formulate major risk disposal plans and external disclosure documents; hold regular meetings to review human rights risk reports; approve supplier termination decisions.

- 2) 人力资源部：统筹人权尽职调查全流程；组织风险识别/评估/整改；协调跨地区人权合规；跟踪措施有效性；组织内外部沟通。

Human Resources Department: Coordinate the entire process of human rights due diligence; organize risk identification, assessment and rectification; coordinate cross-regional human rights

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compliance; track the effectiveness of measures; organize internal and external communication.

- 3) 采购部与物流部：负责供应链人权尽职调查、高风险供应商筛查；供应商人权整改跟踪、违规暂停/终止。

Procurement Department and Logistics Department: Responsible for supply chain human rights due diligence and screening of high-risk suppliers; track suppliers' human rights rectification and suspend/terminate cooperation for violations.

- 4) 各部门：执行人权合规要求，上报风险隐患；配合侵权事件调查、整改、培训。

All Departments: Implement human rights compliance requirements and report potential risks; cooperate in the investigation, rectification and training of infringement incidents.

## 5.Related documents 相关文件

《工商企业与人权指导原则》 Guiding Principles on Business and Human Rights

《劳动法》 Labor Law of the People's Republic of China

《劳动合同法》 Labor Contract Law of the People's Republic of China

《未成年人保护法》 Law on the Protection of Minors of the People's Republic of China

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### 文件变更履历表

版本	修订内容	修订日期	修订	审批
A0	根据跨地区人权合规性要求，制定本规定并发布 Formulated and issued these regulations in accordance with cross-regional human rights compliance requirements	2026/5/13	Emico Zheng	Yong Chen