



## Human Rights Policy

Universal Scientific Industrial (Shanghai) Co., Ltd. and its subsidiaries (hereafter referred to as “USI”) strongly believe that the corporate has the responsibility to respect human rights. We are committed to protecting and promoting human rights with our employees, joint ventures, contractors, business partners (suppliers, clients), local governments, communities and other stakeholders.

USI supports, respects, and is committed to human rights as defined in Principles 1 and 2 in the United Nations (UN) Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labor Organization’s Declaration of Fundamental Principles and Rights at Work, the USI Code of Business Conduct and Ethics and the laws of the countries in which we operate. Being a member of the Responsible Business Alliance (RBA), we adopt its Code of Conduct in our global operations to enforce our commitment to protecting human rights.

Accordingly, USI has established this Human Rights Policy and Management Principles to communicate our commitment to all stakeholders. The following management principles have been adopted:

### **Regular Policy Review**

- This policy is reviewed annually and updated as necessary to ensure its effectiveness.

### **Human Rights Due Diligence**

- Integrate RBA Code of Conduct into USI’s human rights management system and conduct regular human rights due diligence to identify and assess human rights risks and potential impacts, formulate corresponding prevention and mitigation measures, and track implementation results.
- If reveals human rights risks, potential impacts or human rights violations, the mitigation or remedial measures will be taken respectively.
- The human rights risks, potential impacts or human rights violations that are assessed and identified through human rights due diligence, as well as the implementation performance of human rights management, will be regularly reported to senior management. The corresponding human rights policies, human rights management regulations or procedures, etc. will be revised to promote a more complete implementation of human rights protection. Simultaneously, the human rights management targets, actions, performance and progress on the company official sustainability website, sustainability reports and human rights due diligence reports will be disclosed to the public.

### **Human Rights Training and Propagation**

- Continuously advocate the human rights policy internally and externally, provide human rights training to our employees and suppliers to raise concern and attention to human rights issues and convey information of the complaint channels to apply the implementation and culture of respecting human rights.

### **Grievance Mechanism and Whistleblower Protection**

- In order to protect employees and all stakeholders from human rights violations or negative impacts, USI ensures that we have the right to file complaints, notifications, or grievances regarding any perceived potential human rights violations and to seek

remedies for any human rights violations or negative impacts.

- To ensure that the complaint mechanism is available and effective, if a violation of human rights policy is found, specific facts, relevant information and documents can be reported through the complaint channel, either anonymously or by name.
  - ◆ Internal grievance channels are including but not limited human resources mailbox, employee complaint hotline, and reporting mailboxes in each site.
  - ◆ External reporting can be made through phone call, post address and E-mail ([ethics@usiglobal.com](mailto:ethics@usiglobal.com)).
- With a rigorous and prompt manner to respond to the accusations, an investigation will be convened by the disciplinary review committee. If the investigation results show that there is a violation of human rights protection, USI will take measures to mitigate any adverse impact on human rights, including penalties for perpetrators, counseling for victims, and necessary improvements in policies and procedures to prevent future occurrences, and to provide effective remedies or redress to those whose rights have been violated.
- On the premise of ensuring personal privacy, the number, the content and the results of appeals, notifications or complaints will be disclosed regularly.
- The informant and the reported content will be strictly kept confidential and the appropriate protection measures will be taken in accordance with the laws to secure the personal data and privacy of the informant. There's no tolerance for any form of retaliation against those who report in good faith or assist in the investigation.

#### **Our commitment to enforcing human rights protection through these principles:**

- **Diversity and Anti-discrimination:** We respect the diversity of our employees, contractors, business partners, communities and all other stakeholders. We strictly prohibit differential treatments due to any discrimination based on ethnicity, color, gender, gender identity, sexual orientation, marital status, language, age, nationality, religion, political affiliation, ancestry, physical or mental disability, pregnancy, illness or any other characteristics protected by law to ensure equal recruitment and promotion opportunities are offered to all.
- **Respect and Humane Treatment:** We are committed to treating people with respect and humanity. It is not tolerated to have any form of disrespectful or inappropriate behaviors in the workplace and work-related environment, including but not limited to sexual harassment, maltreatment, corporal punishment, mockery, insult, discrimination, hatred, derogation, threats, hostile behavior, interference, tracking, mental coercion, and aggression, etc.
- **No Forced Labor and Human Trafficking:** Being an employer and a global corporate citizen, we firmly forbid any form of forced labor, including human trafficking and illegal employment, and ensure all employment to be built upon the willingness, which means all employees have the right to choose or terminate the employment with the reasonable notice period in compliance with local laws.
- **Child Labor and Young Workers:** Any form of child labor is strictly prohibited. It is not allowed to employ workers under the age of 16. And there is no tolerance to employ the young workers between the ages of 16 and 18 to perform any work that could jeopardize their health and safety, including night shifts and overtime.

- **Compensation, Benefits and Working Hours:** All relevant laws and regulations on salary, social security, working hours, etc. of the country or the jurisdiction where our operations are located are compliance with. No less than the local legal minimum wage shall be paid to employees on time and unequal pay for equal work is eliminated; working hours are not to exceed the maximum set by local law, with a maximum daily working time, and a workweek should not be more than 60 hours per week (except in emergency or unusual situations), and all employees shall be allowed at least one day off every seven days; special leave or compensation for unused leave is granted by law.
- **Safety and Health in the Workplace:** We are committed to providing our employees a safe and healthy work environment and striving for with zero injuries and accidents through complying with all applicable health and safety regulations and ensuring all procedures right in place.
- **Freedom of Speech and Association:** It is fully respected and supported that all employees have the right to freely associate and express their points of view. We commit not to hinder their legitimate exercise of rights with any interference or restriction and are dedicated to build a trust and positive environment and provide diverse, open, and two-way communication channels for internal and external stakeholders to share their concerns or suggestions without fear of interference, intimidation, reprisal, discrimination, or harassment.
- **Protection of Privacy:** We recognize privacy, as a fundamental human right, shall be protected. Complying with USI Privacy Policy, we strive for safeguarding personal data privacy and data security.
- **Product Responsibility and Conflict-Free Minerals Commitment:** We recognize the corporate responsibility for the products covers the entire life cycle from the raw materials used to their use and subsequent cycling. Keeping with USI conflict-free mineral procurement commitments, no metal or product from conflict minerals or areas that violate human rights is purchased or used on USI manufacturing and production. It is also not tolerated that USI products will be used for human rights violation.



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Jeffrey Chen  
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