

GCL SI

Human Rights Principles

GCL SI Human Rights Principles

Our Approach

Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. Respect for human rights is rooted in our values and applies wherever we do business. GCL SI Human Rights Principles formalize GCL SI commitment to respect human rights and embody common principles reflected in the United Nations (UN) Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, core International Labor Organization Conventions, the Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises, and the laws of the countries in which GCL SI and our subsidiaries operate.

We are committed to maintaining and improving the management system and mechanism to avoid any potential risks of human rights violations related to our own operations, our supply chain, and our products. GCL SI has established an integrated approach to managing human rights across our business. We apply the following policies, regulations, and procedures to comply with the global human rights principles and to prevent any potential infringements of human rights resulting from our activities, products, or any activities in our supply chain:

- A. GCL SI Employee Handbook & Code of Conduct
- B. Environment, Occupational Health & Safety (EHS) System
- C. Environmental Management Policy
- D. Product Stewardship Policy
- E. GCL SI Business Partner Code of Conduct
- F. Supplier EHS Management Procedure
- G. CSR Internal Audit Management Procedure

Our Principles

- **Diversity and Nondiscrimination:** GCL SI values diversity in our workforce, as well as in our customers, suppliers, and others. We provide equal employment opportunity for all applicants and employees. We do not discriminate on the

basis of race, color, religion, religious creed, sex, national origin, ancestry, age, physical or mental disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance. We are dedicated at creating and maintaining a diverse working environment and culture by and for our talents from diverse and interdisciplinary background. We respect the devotion and contribution of all our employees and partners and assure equal pay for equal work.

- **Working Hours and Minimum Wage Standards:** Recruitment, employment and negotiation of working hours and wages are on a complete free-will basis. Working hours are not to exceed the maximum set by local law and are to set up in consideration of the physical and mental wellness of employees. Customized to the local laws and regulations as well as employee's needs based on local working conditions, Employee Handbook used by GSI SI and its subsidiaries in different countries and areas describes the working hours and benefits entitled by our own employees. GCL SI will assure that employee compensation complies with applicable wage laws, including those related to minimum wages, working hours and overtime hours, and legally mandated benefits. Our suppliers shall also take all necessary measures to comply with all applicable laws in terms of working hours, wages and compensations, overtime work and employee benefits and to assure that their employees work for no more than the maximum weekly working hour as permitted by applicable laws, and for no longer than the longest consecutive period of work as permitted by applicable laws.

- **Prevention of Human Trafficking, Forced Labor, and Child Labor:** GCL SI will not use or tolerate the use of forced, debt bonded, indentured labour, involuntary prison labour, slavery or human trafficking in our business or supply chain. We forbid harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. Also, GCL SI will not employ anyone under the age of 16 in any position, and workers under the age of 18 should not perform hazardous work, overtime, or night shift work. GCL SI expects its suppliers to comply with these expectations.

- **Workplace Safety:** GCL SI is committed to providing a safe and healthful workplace for our employees, contractors, and communities. GCL SI will seek to provide a secure business environment for the protection of our employees, product, materials, equipment, systems and information. We strive to comply with all applicable regulatory requirements as a minimum, and implement programs and processes to achieve greater protection, where appropriate.

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- **Responsibility in Supply Chain:** As embodied in GCL SI Business Partner Code of Conduct and Supplier EHS Management Procedure, GCL SI expects its suppliers to set up and maintain fair employment, environmental, health and safety, and ethics practices that meet or even exceed, all applicable laws and regulations. We have a good understanding of conflict minerals requirements and work diligently with suppliers to promote sustainable development by way of ethical sourcing. GCL SI formulates formal conflict minerals management policy and requires all suppliers to sign and apply it into their product chains to avoid any kind of conflict minerals, and deliver the requirement to upstream suppliers.
 - **Environment Stewardship:** GCL SI adopts a precautionary approach to the materials used in our products. We strive to conserve energy, water and other natural resources, and work to reduce the environmental impact of waste generation and emissions to air, water, and land. Our commitment to environmental stewardship is embodied in GCL SI's Environmental Management Policy. GCL SI continuously keeps vigilance in its commitment to safeguard environment stewardship in its global supply chain.
 - **Freedom of Association/Collective Bargaining:** GCL SI recognizes that in many of the locations where we operate, employees have the right to freely associate or not associate with third party organizations such as labour organizations, along with the right to bargain or not bargain collectively in accordance with local laws. GCL SI respects those rights and is further committed to treating our employees with dignity and respect, and creating an environment of open communication where employees can speak with their managers about their ideas, concerns or problems, and team together to address workplace issues. We encourage our employees to share their ideas, concerns, or suggestions through an environment of cooperation and teamwork.
 - **Harassment Prohibition:** GCL SI employees are required to treat co-workers, customers, and suppliers with dignity. GCL SI is committed to providing a workplace free of harassment. We do not tolerate either harassment behaviour or any other form of unethical business practice.
 - **Privacy and Freedom of Expression:** GCL SI is committed to the right of privacy and freedom of expression and we seek to protect against unauthorized access, use, destruction, modification, or disclosure of personal information and data as outlined in GCL SI's Privacy Policy. GCL SI takes seriously its role in developing technologies which protect the privacy and

security of individuals by helping to ensure the protection of data and minimize potential threats. GCL SI utilizes and advocates for a Privacy by Design approach, which includes privacy as a foundational component of the product and service development process. GCL SI's policy is not to design functionality into any of our products that would enable customers (including governments) to circumvent security features, or otherwise compromise the security of our technologies in ways that could be used to infringe on privacy or limit the freedom of expression (or other human rights) of individuals. In addition, we advocate for global policies and standards to build trust across the global digital infrastructure, and to protect data privacy and data security as part of our public policy actions.

- **Product Liability:** GCL SI engages in Photovoltaic (PV) products R&D, manufacturing, PV project development, smart micro-grid and integrated multi-energy system development and sales, as well as energy cloud platform operation. As the range of products and services we offer broadens and changes, we evaluate potential concerns about how technology products may be used to infringe on human rights. The challenges include environment health and safety (EHS) concerns that may arise from R&D, manufacturing, transportation, use and end-of-life product disposal. We have Product Stewardship Policy in place to ensure product safety and environmental protection throughout the product life span.

Our Policies

Employees and partners can learn more about our ethics and policies on defending human rights in our training sessions. When in doubt, employees and partners are also encouraged to seek advice from our internal control centre or human resource department.

- **No Retaliation:** Every associate should be free to ask questions, raise concerns and make complaints about treatment they believe is improper, unfair, unethical, harassing or discriminatory.

GCL SI tolerates no form of retaliation against an associate for expressing a concern or making a complaint against violation of human rights policies, whether it is unlawful threat, intimidation, physical or legal attacks.

Reporting a Concern

In the case of any concern or suspicion of an ethical violation or retaliation, please report to the labour union of GCL SI or to: <http://www.gcl-power.com/en/contact/lzxx.html>. Any associate, employee of GCL SI, supplier and other external stakeholder is encouraged to report their concern and any potential violation. GCL SI assures the anonymity and confidentiality of the reporting party.

Summary

This policy is intended to succinctly express GCL SI commitment to respect human rights on a worldwide basis. More information on our stakeholder engagement processes, management systems, and performance is available in GCL SI ESG Report. These principles are reviewed annually and updated as needed. We are committed to continuous improvement in our performance, transparent communication, and to sharing the knowledge that we gain with our stakeholders, including employees, customers, suppliers, shareholders, and the communities in which we live and work.

Zhu Yufeng

Chairman of GCL System Integration Technology Co., Ltd

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