Compliance Manual for the Employment of Minors

Effective 1 Feb 2020

Chapter 1 General Provisions

February 1, 2020

1.1 Purpose

To strictly comply with the Labor Law of the People's Republic of China, Regulations on the Prohibition of Child Labor, Minor Protection Law and other relevant laws and regulations, fulfill corporate social responsibilities, protect the physical and mental health of minors, and eliminate any possibility of employing minors under the age of 18 (including child labor under the age of 16 and juvenile workers aged 16 to under 18), this manual is formulated in light of the production characteristics of the PCB (Printed Circuit Board) industry. It aims to establish a "zero-tolerance" control system to ensure the company's complete compliance in employment.

1.2 Scope of Application

This manual applies to all operating entities, all departments (including but not limited to the Human Resources Department, all production departments, EHS Department, Supply Chain Management Department, Administration Department, etc.) and all management personnel and employees of the company.

This manual applies to all employment links and forms, including:

Direct employment: all regular employees, temporary workers, interns, seasonal workers.

Indirect employment: all dispatched workers, outsourced service personnel, on-site personnel assigned by project partners, on-site personnel from suppliers.

Other forms: any person providing labor or services on the company's premises.

1.3 Core Prohibitions and Principles

Absolute Prohibition: The company strictly prohibits recruiting or employing minors under the age of 18 for any reason and in any form.

No Exception Principle: This prohibition applies to all positions, all employment emergencies and all forms of cooperation without any exemption.

Extended Liability Principle: The company bears the primary responsibility for its own employment acts, and also has the responsibility of prudent review and continuous supervision over the employment compliance of cooperative entities such as labor dispatch and business outsourcing parties.

Full Staff Responsibility Principle: All employees are obligated to abide by and supervise the implementation of this prohibition. Management personnel at all levels bear direct management responsibility for the implementation in their respective departments/teams.

Chapter 2 A Comprehensive Prohibition Control System

2.1 Absolute Prohibition in the Recruitment and Onboarding Process

Recruitment Promotion: All recruitment advertisements, brochures and notices must clearly state that "the company strictly prohibits the employment of persons under the age of 18, and applications from such persons are declined".

Age Threshold Setting: The minimum age requirement is compulsorily set as "18 years old and above" in the recruitment system and job application forms.

Interview Screening: Interviewers shall make a preliminary judgment on the candidate's age, and for those who are obviously young or whose age is in doubt, age verification shall be conducted first. If a candidate is confirmed to be under the age of 18, the interview process shall be terminated immediately and a record shall be made.

2.2 Mandatory Dual Identity Verification Procedure

All personnel (including cooperative party personnel) must pass the following verifications before taking up their positions in the company:

First Level: Original Document Verification

Mandatory Documents: Original Resident Identity Card of the People's Republic of China (other documents shall not serve as the primary age proof).

Verification Process:a. Identity Matching: The designated "Compliance Verifier" shall check the photo on the document against the person's appearance.b. Information Review: Read the birth date segment in the ID card number character by character, accurately calculate whether the person has reached the age of 18, and be alert to the "near-age" situation.c. Anti-counterfeiting Identification: Verify the authenticity of the document with the help of ID card readers, ultraviolet lamps and other equipment at the special verification counter.d. Signature Confirmation: After the verification is passed, the verifier shall sign on the Onboarding Personnel Age Compliance Verification Statement Form and bear the verification responsibility.

Second Level: System Online Verification

The ID card information of all personnel who have passed the preliminary verification must undergo a secondary verification through the official data interface connected to the company's HR system or an authorized compliance platform.

Rigid Interception: The system shall automatically and permanently terminate the process for anyone whose age is verified to be under 18, and issue the highest-level alert to the Director of Human Resources, Director of EHS and the person in charge of legal affairs.

2.3 Cooperative Party Management and Extended Control

Contract Restrictions: All relevant contracts must include mandatory clauses on "prohibition of employing minors", clarifying the cooperative party's commitments, filing obligations, the company's right of random inspection, and the right to immediately terminate cooperation and pursue liabilities in case of violation.

On-site Entry Audit: Before the entry of cooperative party personnel, the list of such personnel and copies of their ID cards must be submitted for the record, and they shall accept the same dual verification as regular employees.

On-site Random Inspection: The EHS Department and the Human Resources Department have the right to conduct irregular on-site random inspections of the identity documents of cooperative party personnel.

Chapter 3 Supervision, Inspection and Continuous Verification

3.1 Regular Supervision and Inspection Mechanism

Daily Review: The supervisor of the Human Resources Department shall review the verification records of all onboarding/on-site entry personnel on a daily basis.

Monthly Investigation: Conduct age data scanning and abnormal investigation for all personnel (including cooperative party personnel) through the system at the beginning of each month.

Quarterly Inspection: A joint team consisting of the Human Resources Department, EHS Department and Administrative Security Department shall conduct on-site special inspections every quarter, including random spot checks of documents, observation of employees' appearance, inspection of scheduling records, etc.

Annual Audit: Engage external professional institutions to conduct annual compliance audits, and take "prohibition of employing minors" as the primary audit item.

3.2 Reporting and Whistleblower System

Channel Disclosure: Set up and announce a dedicated report hotline, email address and physical report box to ensure anonymous reporting is available.

Clear Scope: Encourage reports of any suspected employment of persons under the age of 18 (including by cooperative parties).

Protection and Acceptance: The Legal Affairs Department or the Audit Department shall assign special personnel to accept reports, ensuring independent and confidential investigations. Any form of

retaliation is strictly prohibited, and violators shall be severely punished.

Chapter 4 Emergency Handling Procedures for Discovered Violations

Once a suspected or confirmed violation is discovered, the following emergency procedures must be initiated immediately:

4.1 Step 1: Immediate Isolation and Preliminary Disposal (within 24 hours)

On-site Halt: Immediately order the suspected minor to stop working and remove him/her from the working area.

Urgent Reporting: Immediately report to the Director of Human Resources, Director of EHS, person in charge of legal affairs and the general manager at the same time.

Preliminary Inquiry: Conduct an inquiry for verification and emotional comfort in the presence of personnel from the Human Resources Department and the Legal Affairs Department, and keep detailed records.

4.2 Step 2: Investigation and Confirmation, and Statutory Filing (within 72 hours)

Comprehensive Investigation: Seal up all relevant records, interview relevant personnel and find out the facts.

Final Verification: Contact the public security organ or the guardian for the final confirmation of age.

Government Filing: If it is confirmed that child labor (under the age of 16) has been employed, a written report must be submitted to the labor supervision department within 24 hours; in case of illegal employment of juvenile workers (aged 16 to under 18), a filing explanation must also be submitted.

4.3 Step 3: Proper Disposal and Comprehensive Rectification

Personnel Resettlement: Escort the minor back safely, notify the guardian, and settle the remuneration in accordance with the law.

Bear Legal Liabilities: Prepare to accept administrative penalties and bear possible medical and compensation liabilities.

Severe Internal Accountability: Impose the maximum penalty (termination of labor contract) on the direct liable persons and management liable persons; immediately terminate cooperation with the violating cooperative party and pursue its liabilities.

System Rectification: Circulate a notice of the incident, fix institutional loopholes, and conduct intensive training for all staff.

Chapter 5 Training, Commitment and Corporate Culture

5.1 Mandatory Full Staff Training

New Employee Training: The onboarding training must include a special session on this prohibition, with a duration of no less than 1 hour, and a test shall be conducted; those who fail the test shall not be employed.

Management Personnel Training: Conduct special intensive training for management personnel every year to clarify management responsibilities and consequences.

Cooperative Party Notification: Send the prohibition policy to cooperative parties every year and require a written confirmation of receipt.

5.2 Written Commitment

Employee Commitment: All employees must sign the Age Compliance and Prohibition of Employing Minors Commitment Letter upon onboarding.

Management Responsibility Letter: All department supervisors and above must sign the Management Responsibility Letter for the Prohibition of Employing Minors.

5.3 Corporate Culture Construction

Incorporate "law-abiding employment and thorough rejection of child labor" into the company's core values, and create a compliance cultural atmosphere where everyone is responsible and consciously upholds the rules through multi-channel publicity.

Chapter 6 Supplementary Provisions

6.1 Effect of the Manual

This manual is a red-line document for the company's employment management, and its provisions are the minimum compliance standards; any internal provisions conflicting with it shall be automatically invalid.

6.2 Interpretation and Revision

This manual shall be jointly interpreted by the company's Human Resources Department and Legal Affairs Department, and shall be revised in a timely manner according to laws, regulations and the company's needs.

6.3 Effective Date

This manual shall take effect on the date of issuance.