



——反奴隶制和人口贩卖政策

Anti-Slavery and Human Trafficking Policy

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1. 介绍 Introduction:

- 现代奴隶制是对基本人权的根本侵犯，是犯罪行为。它有多种形式，包括奴役、奴役、强迫或强制劳动以及人口贩运。这些犯罪行为密切相关，但在法律上却截然不同：
- Modern slavery is a fundamental violation of basic human rights and a crime. It takes various forms including slavery, servitude, forced or compulsory labour and human trafficking. These offences are closely related but legally distinct:
 - 奴隶制是指对一个人行使所有权
slavery is where ownership is exercised over a person;
 - 奴役涉及通过胁迫提供服务的义务；
servitude involves the obligation to provide services imposed by coercion;
 - 强迫或强制劳动是指以惩罚相威胁而强迫任何人从事非自愿的工作或服务
forced or compulsory labour involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself or herself voluntarily; and
 - 人口贩运涉及安排或便利他人的旅行，以期对其进行剥削。
human trafficking involves arranging or facilitating the travel of another with a view to exploiting them.
- 在所有情况下，社会上一些最弱势的人被剥夺了尊严和基本自由，被迫为他人的利益而工作。现代奴隶制最常见的形式是性剥削、包括童工在内的劳动剥削和家庭奴役。

In all cases, some of the most vulnerable people in society are stripped of their dignity and basic freedoms and forced to work for someone else's gain or benefit. The most common forms of modern slavery are sexual exploitation, labour exploitation including child labour and domestic servitude.

2. 政策目的 Purpose of the Policy:

- 本政策表达了公司对打击现代奴隶制的承诺。它阐述了我们应对这场斗争的总体方法。公司每年为实施我们的政策而采取的具体步骤均记录在公司根据《2015 年现代奴隶制法案》的要求发布的年度《奴隶制和人口贩运声明》中：

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

This Policy expresses the Company's commitment to the fight against modern slavery. It sets out our overall approach to that fight. The specific steps taken by the Company on an annual basis in the implementation of our Policy are recorded in the Company's annual Slavery and Human Trafficking Statement, published in accordance with the requirements of the Modern Slavery Act 2015: <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

3.政策声明 Policy statement:

- 公司致力于采取措施确保现代奴隶制不再发生：

The Company is committed to taking steps to ensure that modern slavery is not taking place:

- 在自身业务的任何部分
in any part of its own business; and
- 在任何供应链中
in any of its supply chains.

- 公司期望全体员工：

The Company expects all members of staff:

- 在公司采取这些步骤时与公司合作；
to work with the Company as it takes these steps;
- 保持警惕，识别公司业务的任何部分或其任何供应链中可能存在现代奴隶制风险的情况；
to remain vigilant in identifying circumstances where there is a risk that modern slavery might be occurring in any part of the Company's business or in any of its supply chains;
- 立即向高级管理层全面报告任何此类情况；
to report any such circumstances to senior management in full and without delay; and
- 处理自己的个人和家庭事务的方式应确保他们与现代奴隶制没有任何联系，无论是通过刑事犯罪还是通过可能使自己和公司名誉扫地的行为或不行为。

to conduct their own personal and domestic affairs in such a way to ensure that they are in no way connected with modern slavery either through the commission of a criminal offence or through actions or omissions that might bring themselves and the Company into disrepute.

- 就本政策而言，“员工”是指以任何身份为公司工作或与公司一起工作的所有人员，包括：管理人员和董事、员工、工人、承包商、借调人员、实习生、代理人、顾问和代理工作人员。

For the purposes of this Policy, "members of staff" means all persons working for or with the Company in any capacity including: officers and directors, employees, workers, contractors, secondees, interns, agents, consultants and agency workers.

- 公司期望其所有承包商、供应商和其他业务合作伙伴采用相同的标准。在合理可行的情况下，公司将努力确保其承包商、供应商和其他业务合作伙伴有合同义务在其自己的业务和供应链中遵守反映本政策的精神和意图的条款，以支持全面消除现代奴隶制。

The Company expects the same standards from all of its contractors, suppliers and other business partners. The Company will seek to ensure, where reasonably practicable, that its contractors, suppliers and other business partners are contractually obliged to comply with terms that reflect the spirit and intention of this Policy in their own businesses and in their own supply chains in support of the general eradication of modern slavery.

- 公司将不时评估和审查现代奴隶制可能在其业务的任何部分及其任何供应链中发生的风险。根据任何此类风险评估，它可能会不时寻求其承包商、供应商和其他业务合作伙伴的具体保证；必要时，并寻求自行或通过第三方进行尽职调查或具体审计，以确保现代奴隶制没有发生。

The Company will from time to time assess and review the risk that modern slavery may be occurring in any part of its own business and in any of its supply chains. In light of any such risk assessments it may from time to time seek specific reassurances from its contractors, suppliers and other business partners; where necessary, seek to carry out due diligence or specific audits either itself or through third parties to satisfy itself that modern slavery is not occurring.

- 公司致力于在解决现代奴隶制问题上保持透明度，并遵守 2015 年《现代奴隶制法》第 54 条规定的披露义务。

The Company is committed to transparency in its approach to tackling modern slavery consistent with its disclosure obligations under section 54 of the Modern Slavery Act 2015.

4.政策的应用 Application of the Policy

- 本政策适用于所有员工。

This Policy applies to all members of staff.

- 所有员工都应：

All members of staff are expected to:

- 阅读、理解并遵守本政策；
read, understand and comply with this Policy; and
- 向其经理或人力资源部提出疑虑。如果怀疑公司业务任何部分或公司的任何供应链中可能发生现代奴隶制，还请尽早参阅我们的举报政策。
raise concerns with their manager or Human Resources. Please also refer to our Whistleblowing Policy about any suspicion that modern slavery might be occurring in any part of the Company's business or in any of the Company's supply chains at the earliest possible opportunity.

- 公司鼓励开放性，并将支持任何对公司业务的任何部分或公司的任何供应链中可能发生现代奴隶制提出真正担忧的人，即使这种担忧最终被证明是错误的。

The Company wishes to encourage openness and will support anyone who raises a genuine concern that modern slavery might be taking place in any part of the Company's business or in any of the Company's supply chains, even if that concern ultimately turns out to be mistaken.

- 本政策同时也反映公司对其承包商、供应商和其他业务合作伙伴的期望。

This Policy also reflects the expectations that the Company has of its contractors, suppliers and other business partners.

5.对政策的责任 Responsibility for the Policy:

- 公司董事会对本政策负全面责任，包括确保其遵守法律和道德义务。

The Company's board of directors have overall responsibility for this Policy, including ensuring that it complies with legal and ethical obligations.

- 合规和人事部门对实施本政策、监控其使用和有效性、处理有关本政策的任何疑问以及审核内部程序负有主要日常责任。

The Compliance and Human Resources is primarily responsible for the day-to-day implementation of the Policy including monitoring its effectiveness and ensuring that all staff are aware of, understand and comply with the Policy.

- 各级管理层有责任确保其下属理解并遵守本政策。有关该政策的指导可以从合规和人事部门获得。

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Guidance on the policy can be obtained from the Compliance and Human Resources.

6.违反本政策 Sanctions

- 任何员工违反本政策，包括在履行公司职责或个人和家庭事务方面违反本政策，都可能根据公司纪律程序进行处理，并可能导致解雇。

Any breach of this Policy by any member of staff including in respect of his or her duties for the Company or in respect of his or her personal and domestic affairs may be dealt with under the Company's disciplinary procedures and could result in dismissal.

- 如果公司有合理理由相信其业务的任何部分正在发生现代奴隶制：

In the event that the Company has a reasonable belief that modern slavery is occurring in any part of its business:

- 公司将

the Company will:

- 在合理可行的情况下尽快采取补救行动，以确保这种现代奴隶制不再发生，并确保现代奴隶制的受害者得到适当保护；

put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded; and

- 监测所采取的补救行动的有效性，包括为保护受害者而采取的行动；
monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims;

- 公司可根据事实情况，根据纪律程序处理此事，这可能导致解雇任何负有责任的员工。

the Company may, depending on the facts, deal with the matter under its disciplinary procedures which could result in the dismissal of any member of staff found to be responsible.

- 如果公司有合理理由相信任何承包商、供应商和其他业务合作伙伴的业务或供应链中正在发生现代奴隶制，则公司：

In the event that the Company has a reasonable belief that modern slavery is occurring in the business or supply chains of any contractors, suppliers and other business partners, the Company:

- 希望相关承包商、供应商或其他业务合作伙伴：

will expect the relevant contractor, supplier or other business partner:

- 完全透明并提供公司可能就该问题合理要求的信息；
to be fully transparent and supply such information as the Company may reasonably request in relation to the issue;
- 在合理可行的情况下尽快采取补救行动，以确保这种现代奴隶制不再发生，并确保现代奴隶制的受害者得到适当保护；
to put in place remedial action as soon as reasonably practical with a view to ensuring that such modern slavery ceases to occur and that the victims of that modern slavery are appropriately safeguarded; and
- 监测所采取的补救行动的有效性，包括为保护受害者而采取的行动；
to monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims; and
- 定期向公司报告补救措施和保护措施的有效性以及为确保此类现代奴隶制不再发生而采取的任何进一步措施；
to report to the Company at reasonable intervals on the effectiveness of that remedial action and safeguarding and any further steps taken to ensure that such modern slavery ceases to occur;

- 可以根据事实以及与相关承包商、供应商或其他业务伙伴的合同条款，终止或暂停关系，或者以其他方式停止、减少或尽量减少与相关承包商、供应商或其他业务伙伴的业务联系。

may, depending on the facts and the terms of the contract with the relevant contractor, supplier or other business partner, terminate or suspend the

relationship or otherwise cease, reduce or minimise business contact with the relevant contractor, supplier or other business partner.

7.培训 Training:

- 公司为最有可能采取本政策措施的员工提供更具体的培训。培训的目的是确保对现代奴隶制的性质以及公司能够带来的影响有高度的了解，以确保这种情况不会发生在其自身业务的任何部分和任何供应链中。

The Company provides more specific training to those members of staff through whom the steps taken by the Company in compliance with this Policy are most likely to be taken. The aim of the training is to ensure a high level of understanding of the nature of modern slavery and the influence the Company is able to bring to ensure that it does not occur within any part of its own business and in any of its supply chains.

- 公司希望其承包商、供应商和其他业务合作伙伴为其员工提供类似的培训。

The Company expects its contractors, suppliers and other business partners to provide similar training to their members of staff.

8.政策修订 Amendments to the Policy:

- 该政策表达了公司的意愿及其对所解决问题的承诺。然而，其本身并不产生任何合同义务，公司可随时自行修改。

The Policy expresses the will of the Company and its commitment to the issues addressed. However, it does not in itself create any contractual obligations and may be amended by the Company at its discretion at any time.

- 该政策将由公司董事会定期审查，通常与董事会审查公司年度奴隶制和人口贩运声明同时进行。

The Policy will be reviewed by the Company's board of directors on a regular basis, usually at the same time as the board reviews the Company's annual Slavery and Human Trafficking Statement

本政策经董事会批准，自 2023 年 9 月 7 日起生效。

This policy was approved by the Board of Directors effective 7 September, 2023.

黄敏

Min Huang

董事长兼总经理

Chairman of the Board of Directors and President

日期：2023 年 9 月 6 日

Date:6/9/2023