



**TCL ELECTRONICS HOLDINGS LIMITED**

**TCL 電子控股有限公司**

*(Incorporated in the Cayman Islands with limited liability)*

(Stock Code: 01070)

## **Supplier Code of Conduct**

Version: 1.0

## 1 Objective

TCL Electronics Holdings Limited and its subsidiaries (the "Group") is committed to implementing high standards of labor rights, environmental responsibility, and ethical conduct. This Supplier Code of Conduct (the "Code") has been formulated with reference to the Universal Declaration of Human Rights, International Labor Organization conventions, the SA8000 Standard, and the Responsible Business Alliance (RBA) Code of Conduct. The Group requires its suppliers to comply with all applicable laws and regulations of the countries or regions in which they operate, as well as the requirements of this Code.

## 2 Scope of Application

This Code applies to all suppliers of the Group.

## 3 Supplier Code of Conduct

### 3.1 Labor Rights

- 3.1.1 Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, military service status or marital status in hiring and employment practices in terms of wages, promotions, rewards, and access to training.
- 3.1.2 Suppliers shall not threaten workers with, or subject them to, inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment.
- 3.1.3 Suppliers shall not engage in any form of forced labor<sup>1</sup>, trafficked persons or use any form of slave, forced, bonded, indentured, or prison labor.
- 3.1.4 Child labor is not to be used in any stage of manufacturing, and labor protection is provided to underaged workers and female employees.
- 3.1.5 Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest. A workweek shall be restricted to 60 hours, including overtime hours, and workers shall have at least one day off every seven days except in emergencies or unusual situations.

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<sup>1</sup> Note: The term "forced labor" as mentioned in Article 3.1.3 of the Code refers to all involuntary labor or services that anyone is forced to perform under the threat of any punishment, including but not limited to: a) Abuse of vulnerability, b) Deception, c) Restriction of movement, d) Isolation, e) Physical and sexual violence, f) Intimidation and threats, g) Retention of identity documents, h) Withholding of wages, i) Debt bondage, j) Abusive working and living conditions, k) Excessive overtime.

- 3.1.6 Suppliers shall meet all legal requirements relating to wages and benefits, including overtime pay and minimum wages, pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure.
- 3.1.7 Suppliers shall respect workers' right to freedom of association, allowing workers to associate with others, form and join (or not join) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.
- 3.1.8 Suppliers shall ensure that workers have an effective mechanism to report complaints to facilitate open communication between management and workers.

### **3.2 Health & Safety**

- 3.2.1 Suppliers must provide employees with a safe and healthy working environment and shall ensure compliance with all applicable health and safety laws and regulations.
- 3.2.2 Suppliers shall obtain, update in a timely manner, and comply with all required health and safety permits.
- 3.2.3 Suppliers shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.
- 3.2.4 Suppliers shall identify, evaluate and control the impact on workers engaged in physically heavy work, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.
- 3.2.5 Suppliers shall identify and assess potential emergency situations, develop and implement emergency plans and response procedures that will minimize harm to life, environment, and property.
- 3.2.6 Suppliers shall establish procedures and systems to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers.
- 3.2.7 Suppliers shall provide workers with reasonably accessible and clean toilet facilities, as well as potable water. Their dining, food preparation, and storage facilities shall be sanitary. Worker dormitories provided by supplier or a third-party shall be clean, safe, and have reasonable living space.

3.2.8 Suppliers shall post health and safety related information in the workplace and provide appropriate workplace health and safety trainings to workers to correctly understand the health and safety risks in the workplace they are exposed to.

### **3.3 Environment**

3.3.1 Suppliers shall obtain, update, and comply with all required environmental permits, approvals, and registrations, and their operational and reporting requirements are to be followed.

3.3.2 Suppliers shall comply with the relevant requirements of the regulated substances management specifications of the Group in terms of all goods it manufactures for, or provides to, the Group.

3.3.3 Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste including hazardous waste and non-hazardous waste.

3.3.4 Suppliers shall implement a systematic approach to identify, control, and reduce wastewater produced during its operations. Supplier shall conduct routine monitoring of the performance of its wastewater treatment systems.

3.3.5 Suppliers shall identify, manage, reduce, and responsibly control wastegas emissions emanating from its operations that pose a hazard to the environment. Suppliers shall conduct routine monitoring of the performance of its wastegas emission control systems.

3.3.6 Suppliers shall identify, manage, reduce, and responsibly control Greenhouse Gas (GHG) emissions from its operations.

3.3.7 Suppliers shall identify, control, monitor, and reduce noise generated by the facility that affects boundary noise levels.

3.3.8 Suppliers shall regularly quantify, set targets, monitor progress, and reduce consumption of fossil fuel, water, hazardous substances, and natural resources to the greatest extent possible.

### **3.4 Ethics**

3.4.1 Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. Supplier shall prohibit offering bribery cash, securities, payment vouchers, communication equipment, vehicles, stationery, office goods of high value, or other valuables to the customers and stakeholders of its customers,

organizing high-value tourism or entertainment activities for the customers and stakeholders of its customers.

- 3.4.2 Suppliers shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties and as required by laws.
- 3.4.3 Suppliers shall respect intellectual property rights and safeguard customer information.
- 3.4.4 Suppliers shall adhere to the standards of fair business, advertising and competition.
- 3.4.5 Suppliers shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Supplier shall keep whistleblowers and their information confidential and prohibit retaliation.
- 3.4.6 Suppliers shall adopt a policy and exercise due diligence on the source and chain of supervision of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

### **3.5 Management System**

- 3.5.1 Suppliers shall implement or maintain social responsibility management systems that facilitate compliance with this Code and the law and regulations, identify and mitigate related operational risks, and facilitate continuous improvement.
- 3.5.2 Suppliers shall develop and issue the social responsibility policies, and make a clear commitment to complying with relevant laws and regulations, meet customer requirements and comply with the requirements of this Code.
- 3.5.3 Suppliers shall designate company representatives responsible for ensuring the implementation and periodic review of its management systems. Senior management shall regularly conduct management review to understand and improve the operation of the management system.
- 3.5.4 Suppliers shall identify and monitor applicable laws, regulations and customer requirements, including the provisions of this Code.
- 3.5.5 Suppliers shall develop and maintain a process to identify labor and human rights, health

and safety, environmental, business ethics, and legal compliance risks associated with its operations; determine the relative significance of each risk; and implement appropriate procedures and controls to minimize the identified risks.

- 3.5.6 Suppliers shall develop written performance objectives, targets and implementation plans in achieving the social, environmental, and health and safety performance, including periodic assessments of the performance against those objectives.
- 3.5.7 Suppliers shall develop training plans for management and employees to continuously improve their awareness and ability, so as to implement its policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
- 3.5.8 Suppliers shall clearly and accurately communicate its policies, practices, expectations and performance related to corporate social responsibility to employees, suppliers, customers and other stakeholders.
- 3.5.9 Suppliers shall continuously evaluate employees' understanding of the practices and terms covered by this Code, and collect employees' feedback for continuous improvement.
- 3.5.10 Suppliers shall conduct self-assessment regularly to ensure compliance with laws and regulations, the requirements of this Code and customer requirements, and timely correct the deficiencies identified by internal and external inspection or audit.
- 3.5.11 Suppliers shall maintain appropriate documents and records to ensure regulatory compliance.
- 3.5.12 Suppliers shall establish a supply-chain social responsibility management system and extend the obligations and requirements of this Code to their sub-suppliers, monitoring and assessing their compliance.

#### **4 Information Disclosure and Communication Mechanism**

The Group will regularly and proactively disclose its supply chain performance and progress, maintain transparent communication with the public through its annual ESG report, and accept public oversight. The Group is committed to handling all environmental inquiries, suggestions, and complaints in an open and transparent manner. Any stakeholder can provide feedback through our ESG-related mailbox (esgcommittee@tcl.com) or the Group's whistleblowing platform (tmtjubao@tcl.com).

All feedback will be kept strictly confidential and will be investigated and handled by a dedicated team based on the principles of fairness and objectivity. The results will be promptly reported back to the relevant parties.

#### **5 Code Oversight, Evaluation and Updates**

The Group will conduct a comprehensive review of this Code periodically, revise and optimize it in a timely manner based on changes in laws and regulations, technological advancements, corporate strategic adjustments, and stakeholder expectations, to ensure its continued applicability and effectiveness.