

Statement of Human Rights Policy of Avary Holding (Shenzhen) Co., Ltd.

Our Promise

We are committed to respect human rights and to ensure ongoing identification, monitoring and management of human rights risks. All of our operation sites comply with applicable labor and employment laws. We are also committed to follow the principles of the United Nations Declaration on the Rights and Duties of Human Rights, the International Labor Convention, the Responsible Business Alliance (RBA) Code of Conduct, and UN Guiding Principles for Business and Human Rights (UNGPs).

Avary adopted its first Human Rights Policy in 2021 and has committed to regularly review, evaluate and update its strategies, management and due diligence processes. This latest update streamlines and clarifies principles that Avary upholds, and details our overall approach to embedding respect for human rights across our global operations and value chain.

Avary voluntarily complies with and collects information on all social laws of relevant authorities as well as customer requirements to ensure that we identify and address any potential human rights issues at all our global operation sites. Avary takes additional due diligence measures to ensure that all employees are voluntary and strictly prohibits any form of forced, prison or compulsory labor. In addition, Avary establishes unobstructed employer-employee communication channels to provide an effective grievance mechanism. We initiate immediate investigation procedures and implement relevant remediation measures in any situation of human rights violations. At the same time, we have established Supplier Social Responsibility Code of Conduct and require our suppliers and business partners (including contractors) work together to protect human rights.

Scope of Statement

This policy applies to all employees, subsidiaries, business partners, suppliers, and contractors of Avary Holding (Shenzhen) Co., Ltd.

Basic Principles

• A safe and healthy work environment

Each operation site complies with labor and environmental laws and regulations set by the local competent authorities to ensure reasonable working conditions, as well as a safe and healthy working environment for our employees.



We provide an open platform through various communication channels to initiate an investigation process immediately upon receipt of a complaint, and to develop improvement plans and implement remedial measures to reduce risks in the event of human rights violations. We will treat the identity of the complainant and the content of the complaint confidentially and prohibit any discrimination, retaliation, threat or harassment of the complainant.

Internal communication: Employee Service Center, suggestion boxes, and Care Hotline

External communication: whistleblowing email: A-H-M@Avaryholding.com; whistleblowing website (www.avaryholding.com/contact.aspx); and whistleblowing hotline: ++86-755-3381-0388.

We proactively provide and share information on how to access available grievance mechanisms throughout our organization and to our suppliers to ensure that our employees and other stakeholders are aware of how to submit any grievances, complaints or suggestions.

Governance

The Sustainability Committee constituted by our Board members is committed to continuously enhance and uphold human rights by conducting regular reviews on Avary overall operations, social responsibility, and environmental, safety and health performance.



Chairman