



Newtech Technology Holdings Limited

MANAGEMENT POLICY AND MANUAL

Policy #: NT-CP-015-OPS

Title: HUMAN RIGHTS & WORKING CONDITION

Contents

I. Introduction.....	2
II. Purpose	2
III. Roles and Responsibilities	2
IV. Guidelines	2
<i>i. Human Rights</i>	2
<i>ii. Freedom of Association</i>	2
<i>iii. Equal Opportunities</i>	2
<i>iv. Working Time and Paid Holiday</i>	3
<i>v. No Child Labor</i>	3
<i>vi. No Forced Labor</i>	3
<i>vii. Non-Harassment</i>	3
<i>viii. Health and Safety at Work</i>	3
<i>ix. Non-Discrimination</i>	3
V. Review of the Policy	3
VI. Acknowledgement	3

Document Version

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I. Introduction

Newtech Technology Holdings Limited (the "**Company**") is committed to an inclusive work culture and appreciates and recognizes that all people are unique and valuable and should be respected for their individual abilities. The Company does not accept any form of harassment or discrimination based on gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age or political opinion. This commitment is built based on the framework of policies and procedures designed to ensure fairness in the recruitment, development and retention of all employees.

The Company is also committed to offering safe and healthy workplaces in accordance with national legislation. It seeks continuous improvement of its occupational health and safety performance.

II. Purpose

The policy provides not only general principles and guidelines to all employees of the Company, but also provides suitable channel of communication for any grievance reporting.

III. Roles and Responsibilities

- ✓ All employees must be in compliance with all applicable laws and regulations of the countries where the Company operates. Where the applicable local laws and regulations require higher or additional levels of protection of human and employment rights than those set out in this Policy, the local laws and regulations will take precedence.
- ✓ All employees are encouraged to report any actual, suspected or potential violations of all policies of the Company.

IV. Guidelines

i. Human Rights

The Company seeks to honor the principles of internationally recognized human rights wherever operates. Every employee of the Company shall be treated with dignity and shall not suffer harassment, physical or mental punishment or other forms of abuse.

The Company has already set up grievance mechanism which is transparent, equitable and predictable to enable the remediation of any adverse human rights impacts that may arise in its operations. Please refer to the Whistleblower Mechanism for further information or consult local HR & Admin Department.

The Company promotes effective employee engagement throughout its operations and welcomes open feedback from employees on all matters of the Group business.

ii. Freedom of Association

The Company expects the right of employees to establish and join organizations which are designed to engage in collective bargaining and other initiatives to further and defend the interests of the workforce.

No employees of the Company will be dismissed or otherwise prejudiced for reason of membership of such an employee's organization or because of participation in that organization outside of working hours.

iii. Equal Opportunities

The Company shall provide equal employment opportunity and treat all employees fairly. All employees shall only use merit, qualifications and other professional criteria as the basis for employee-related decisions in the Company, regarding for instance recruitment, training, compensation or promotion.

iv. Working Time and Paid Holiday

The Company will follow all applicable laws regarding working hours and conducts operations in ways that ensure humane and productive working conditions. The Company complies with all requirements relating to paid time off, annual leave, sick leave or other leaves as required by applicable laws.

v. No Child Labor

The Company adhere to and strictly complied with the international Child Labor Conventions and child labor laws and regulations in the countries where it operates.

The minimum age of full-time employees of the Company shall not be less than 18 years old.

vi. No Forced Labor

Any forms of forced labor are not accepted by the Company.

All employees shall provide their services to the Company on an entirely voluntary basis and no one is forced to remain in employment of the Company against their will.

vii. Non-Harassment

Inhumane treatment, such as physical abuse or sexual harassment and abuse are subject to zero-tolerance of the Company. All conspicuous acts including the threat of harassment may result in warnings or even summary dismissal.

Harassment acts includes but not limited to insults, psychological and physical coercion, or any forms of corporal punishment.

viii. Health and Safety at Work

In consideration of the nature of business of the Company, health safety and environmental savings are core concerns of the Company. For details, please refer to NT-CP-001-OPS "Health Safety & Environmental Policy".

ix. Non-Discrimination

The Company strictly prohibits discrimination, victimization, bullying and harassment against any employee or any applicant for employment with the Company, whether such discrimination or harassment is based on sex, race, age, color, ancestry, religion, belief, disability, sexual orientation, marital status or any other feature protected by law.

V. Review of the Policy

This Policy will be reviewed periodically and updated whenever necessary to ensure the continuous improvement of working conditions and management of labor risks in the Company's global operations.

VI. Acknowledgement

Any significant changes to the Policy will be disclosed to every stakeholder (both internal and external).