

劳工与人权管理政策 Labor and Human Rights Management Policy

致力于构建公平、安全、包容的工作环境

Commit to building a fair, safe, and inclusive working environment

一、政策愿景与适用范围 Policy Vision and Application Scope

政策愿景：思源电气坚信，尊重和保障人权是负责任企业的基石，也是实现业务可持续发展的核心动力。本政策旨在确立公司对国际公认人权与劳工原则的坚定承诺，确保在所有运营和价值链中，每位员工的尊严、权利和福祉得到充分尊重与保护，共同构建一个公平、安全、包容的工作环境。

Policy Vision: Sieyuan Electric firmly believes that respecting and safeguarding human rights constitutes the cornerstone of a responsible enterprise, as well as the core driving force for achieving sustainable business development. This Policy aims to establish the Company's unwavering commitment to internationally recognized human rights and labor principles, and to ensure that the dignity, rights and well-being of every employee are fully respected and protected across all operations and the value chain. Together, we strive to build a fair, safe and inclusive working environment.

适用范围：本政策适用于思源电气全球所有实体、全体员工（包括临时及派遣员工）及全业务流程，并对供应商、承包商等商业伙伴具有约束力，致力于在“企业-伙伴-社会”层面推动人权标准的共同提升。

Application Scope: This Policy applies to all global entities, all employees (including temporary and dispatched employees), and the entire business process of Sieyuan Electric. It shall also be binding on business partners such as suppliers and contractors, committed to jointly advancing human rights standards at the “Enterprise-Partner-Society” level.

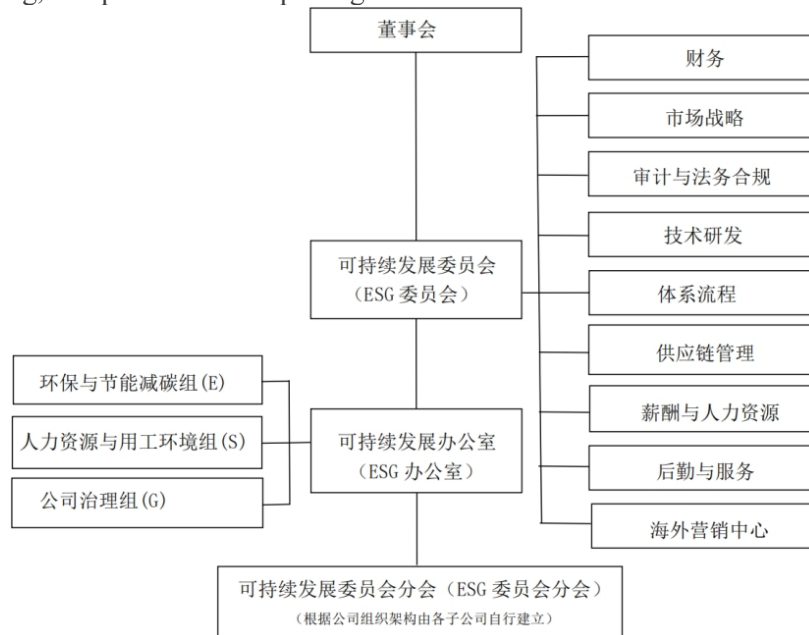
二、治理架构与责任分配 Governance Structure and Responsibility Allocation

思源电气已建立一个四级 ESG 治理体系融合的劳工与人权管理议题，确保本政策得到有效贯彻。

Sieyuan Electric has established a four-tier integrated ESG governance system covering labor and human rights management topic, ensuring the effective implementation of this Policy.

- 董事会：**作为最高监督机构，负责审批包含劳工与人权绩效的年度 ESG 报告，并对公司人权尽责管理履行总体监督职责。
- Board of Directors:** As the supreme oversight body, it is responsible for approving the annual ESG Report covering labor and human rights performance, and exercises overall oversight of the Company's human rights due diligence management.
- 可持续发展委员会：**作为核心决策与统筹机构，负责将人权风险纳入公司 ESG 战略，审批本政策及目标，并监督其在全公司及子公司的执行情况。
- Sustainability Committee:** As the core decision-making and coordination body, it is responsible for integrating human rights risks into the Company's ESG strategy, approving this Policy and its objectives, and supervising implementation across the Company and its subsidiaries.
- 可持续发展办公室（人力资源与用工环境组(S)）：**作为专业执行机构，由人力资源中心统筹，具体负责劳动用工、职业健康与安全、多元包容、员工发展等所有社会（S）议题的实施、监测与报告。

- **Sustainability Office (Human Resources and Workplace Environment Team (S)):** As the professional executive body, coordinated by the Human Resources Center, it is specifically responsible for the implementation, monitoring and reporting of all social (S) topics including labor and employment, occupational health and safety, diversity and inclusion, employee development, etc.
- **各子公司（可持续发展委员会分会）：**作为落地实施单元，负责在本单位执行本政策与具体目标，履行本地员工关系管理、风险排查、事件处理及绩效汇报的职责。
- **All Subsidiaries (Subcommittees of the Sustainability Committee):** As the implementation units, they are responsible for implementing this Policy and specific objectives within their respective entities, and fulfilling duties including local employee relationship management, risk identification, incident handling, and performance reporting.



董事会	Board of Directors
可持续发展委员会 (ESG 委员会)	Sustainability Committee (ESG Committee)
财务	Finance
市场战略	Market Strategy
审计与法务合规	Audit and Legal Compliance
技术研发	Technology R&D
体系流程	System Process
供应链管理	Supply Chain Management
薪酬与人力资源	Compensation and Human Resources
后勤与服务	Logistics and Services
海外营销中心	Overseas Marketing Center
可持续发展办公室 (ESG 办公室)	Sustainability Office (ESG Office)
环保与节能减碳组 (E)	Environmental Protection, Energy Conservation and Carbon Reduction Team (E)
人力资源与用工环境组 (S)	Human Resources and Workplace Environment Team (S)
公司治理组 (G)	Corporate Governance Team (G)
可持续发展委员会分会 (ESG 委员会分会) (根据公司组织架构由各子公司自行建立)	Branch Offices of the Sustainability Committee (Branch Offices of the ESG Committee) (Established by each subsidiary in accordance with the Company's organizational structure)

三、核心原则与管理承诺 Core Principles and Management Commitments

思源电气承诺，将国际公认的人权与劳工标准作为企业经营的基本准则。我们不仅严格遵守所有运营所在地的法律法规，更致力于采纳并超越包括《国际人权宪章》及国际劳工组织（ILO）核心公约在内的全球最高标准。我们将这些原则融入企业血液，通过具体行动保障每一位与思源电气相关人员的尊严与权利。

Sieyuan Electric is committed to adopting internationally recognized human rights and labor standards as the fundamental principles of its business operations. We not only strictly comply with the laws and regulations of all locations where we operate, but also strive to adopt and exceed the highest global standards, including the *International Bill of Human Rights* and the core conventions of the International Labor Organization (ILO). We integrate these principles into the corporate DNA and safeguard the dignity and rights of every individual associated with Sieyuan Electric through concrete actions.

- 禁止一切形式的强迫劳动与童工：**思源电气坚守“工作源于自由选择”的铁律。思源电气严禁并杜绝任何形式的强迫劳动，包括但不限于债务束缚、契约奴役、非自愿的监狱劳工以及人口贩运。我们坚决不使用童工，严格核实所有员工的年龄证明，确保其符合 ILO 标准和当地法律中更为严格的年龄规定，并支持合法的青年学徒项目。
- Prohibition of All Forms of Forced Labor and Child Labor:** Sieyuan Electric adheres to the fundamental principle that “work stems from free choice”. Sieyuan Electric strictly prohibits and eliminates all forms of forced labor, including but not limited to debt bondage, contract slavery, involuntary prison labor, and human trafficking. We firmly reject the use of child labor, strictly verifying age documentation of all employees to ensure compliance with the ILO standards and stricter local age laws and regulations, and supporting legitimate youth apprenticeship programs.
- 保障自由择业与公平体面的劳动报酬：**思源电气尊重并保障员工自由择业的权利。在雇佣关系的全周期内，我们推行以价值贡献为核心的公平薪酬体系，确保实现同工同酬。我们承诺，所有薪酬福利不仅完全符合法律要求，更具有市场竞争力，并按时、足额发放，确保加班工资得到合法计算与支付。
- Protection of Free Choice of Employment and Fair & Decent Compensation:** Sieyuan Electric respects and protects employees’ right to free choice of employment. Throughout the entire employment cycle, the Company implements a fair compensation system centered on value contribution to ensure equal pay for equal work. We commit that all compensation and benefits not only fully comply with legal requirements, but also more competitive in the market, and are paid on time and in full, ensuring that overtime pay is legally calculated and paid.
- 尊重合理工作时间与休息休假权利：**思源电气视员工的身心健康与家庭生活为企业可持续发展的基石。因此，我们严格管理工作时间，确保符合法定标准，所有加班均为自愿且受到严格控制。我们保障员工依法享有带薪年假、病假及其他法定假期的权利，支持员工实现工作与生活的健康平衡。
- Respect for Reasonable Working Hours and Right to Rest and Leave:** Sieyuan Electric regards employees’ physical and mental health as well as family life as the cornerstone of sustainable corporate development. Therefore, we strictly manage working hours to ensure compliance with statutory standards, with all overtime being voluntary and rigorously controlled. We safeguard employees’ statutory rights to paid annual leave, sick leave and other legal entitlements, supporting employees in achieving a healthy work-life balance.
- 构建多元、平等、无歧视与无骚扰的工作环境：**思源电气致力于营造一个真正多元、平等、包容的组织氛围。思源电气绝不容忍基于种族、肤色、性别、年龄、国籍、宗教、性取向、性别认同、残疾状况或任何其他受法律保护特征的歧视、骚扰或霸凌行为。我们将通过持续的教育、透明的政策和果断的措施，打造一个让每位员工都感到安全、受尊重并能全心投入的工作场所。

- Building a Diverse, Equal, Non-Discriminatory and Non-Harassment Working Environment:** Sieyuan Electric is committed to fostering a truly diverse, equal and inclusive organizational culture. Sieyuan Electric strictly prohibits discrimination, harassment or bullying based on race, color, gender, age, nationality, religion, sexual orientation, gender identity, disability status, or any other legally protected characteristics. We will cultivate a safe, respectful and engaging workplace for every employee through continuous training, transparent policies and decisive actions.
- 尊重结社自由与集体谈判的合法权利:** 思源电气承认并尊重员工依法自由结社、组建和加入工会、进行集体谈判的合法权利。对于员工代表，我们将秉持诚信原则进行建设性对话。在未设立工会的工作场所，我们鼓励并支持建立其他形式的、有效的员工与管理层沟通渠道。
- Respect for the legitimate rights to freedom of association and collective bargaining:** Sieyuan Electric recognizes and respects the legitimate rights of employees to freely associate, form and join trade unions, and engage in collective bargaining in accordance with the law. We will conduct constructive dialogue with employee representatives in good faith. In workplaces where no trade union exists, we encourage and support the establishment of other forms of effective communication channels between employees and management.
- 创建安全、健康与可持续的工作场所:** 思源电气员工的安全与健康是我们的首要责任。我们承诺建立并维护超越合规要求的职业健康安全管理体系，系统性地识别、评估并控制工作场所风险。通过提供必要的安全设备、实施系统化培训、推广健康文化，我们致力于实现“零事故、零伤害”的长期目标。
- Create a Safe, Healthy and Sustainable Workplace:** The safety and health of Sieyuan Electric employees are our top priority. We are committed to establishing and maintaining an occupational health and safety management system that goes beyond compliance requirements, systematically identifying, assessing and controlling workplace risks. By providing necessary safety equipment, implementing systematic training and promoting a health culture, we strive to achieve the long-term goal of “zero accidents and zero injuries”.

四、量化管理目标 Quantitative Management Objectives

为系统化、可衡量地推进承诺，我们设定以下量化管理目标，所有改善目标均以 2024 年为基准年。

To systematically and measurably advance our commitments, we have set the following quantitative management objectives, with **2024 as the base year** for all improvement objectives.

管理议题 Management Topics	短期目标 (2024 基准年-2026 目标年) Short-term Objectives (Base year 2024 – Target year 2026)	长期目标 (2024 基准年-2030 目标年) Long-term Objectives (Base year 2024 – Target year 2030)
童工与未成年管理 Child Labor and Minor Management	1. 每年经确认的强迫劳动及童工事件为 0; Confirmed incidents of forced labor and child labor each year is 0; 2. 每年完成 100%新员工及高风险供应商的入职/准入人权筛查。 Complete 100% human rights	1. 至 2030 年，对全部高风险供应商完成至少一轮强迫劳动与童工专项尽职调查，覆盖率达 100%; Achieve 100% coverage of dedicated due diligence on forced labor and child labor for all high-risk suppliers by 2030, with at least one round completed; 2. 直接雇员中强迫与童工风险事件

管理议题 Management Topics	短期目标 (2024 基准年-2026 目标年) Short-term Objectives (Base year 2024 – Target year 2026)	长期目标 (2024 基准年-2030 目标年) Long-term Objectives (Base year 2024 – Target year 2030)
	screening for new employees and high-risk suppliers during on-boarding/approval each year.	持续保持为 0。 Forced labor and child labor risk incidents among direct employees remained at 0.
歧视与骚扰 Discrimination and Harassment	1. 每年经确认的歧视与骚扰事件为 0; Confirmed incidents of discrimination and harassment each year is 0; 2. 员工实名投诉意见反馈年度结案率达 100%。 The annual closure rate for employee real-name complaint feedback reaches 100%.	1. 至 2030 年，管理岗位中女性占比提升至 30%（以 2024 年为基准）； Increase the proportion of female in management positions to 30% by 2030 (based on 2024); 2. 员工匿名满意度调查中，对“工作环境公平包容”项的评分年均提升 3%。 Achieve an annual increase of 3% in the score for “fair and inclusive work environment” in the anonymous employee satisfaction survey.
结社自由与集体谈判 Freedom of Association and Collective Bargaining	1. 签订集体谈判协议的员工年度覆盖率 ≥90%； Annual coverage rate of employees covered by collective bargaining agreement ≥ 90%； 2. 集体谈判协议保持有效。 Collective bargaining agreement remains in force and effective.	1. 至 2030 年，在主要运营国家（法律允许前提下），签订集体谈判协议的员工覆盖率提升至 95%； Increase the coverage rate of employees covered by collective bargaining agreement to 95% by 2030 in major operating countries (where permitted by law); 2. 建立至少 2 个成熟的常态化工劳对话平台（如员工委员会）。 Establish at least 2 mature and regular labor-management dialogue platforms (e.g., employee committees).
工作条件与薪酬福利 Working Conditions and Compensation & Benefits	1. 工资（含加班费）发放及时率与合规率 100%； 100% timely and compliant payment of wages (including overtime pay); 2. 法定社会保险缴纳覆盖率 100%。 100% coverage of statutory social insurance contributions.	在主要运营地，员工人力资源专业服务满意度调研得分提升 5%（以 2024 年为基准） Achieve a 5% increase in the employee satisfaction score for HR professional services in major operating locations (based on 2024).
职业健康与安全	1. 工亡及 6 级以上工伤事故为 0； Work-related fatalities and	1. 至 2030 年，可记录工伤事故率（TRIR）较 2024 年基准下降 30%；

管理议题 Management Topics	短期目标 (2024 基准年-2026 目标年) Short-term Objectives (Base year 2024 – Target year 2026)	长期目标 (2024 基准年-2030 目标年) Long-term Objectives (Base year 2024 – Target year 2030)
Occupational Health and Safety	work-related injuries of Grade 6 or above are 0; 2. 年度职业病确诊案例为 0, 员工健康与安全培训覆盖率 100%。 Confirmed cases of occupational diseases each year is 0, and employee health and safety training coverage rate is 100%.	Reduce the Total Recordable Incident Rate (TRIR) by 30% by 2030 compared with the 2024 baseline; 2. 所有生产基地通过 ISO 45001 职业健康安全管理体系认证; All production sites obtain ISO 45001 Occupational Health and Safety Management System certification; 3. 员工年度健康体检参与率 ≥95%。 Annual employee participation rate in health check-ups ≥ 95%.
发展与沟通 Development and Communication	1. 内部处罚合规率 100%; Internal penalty compliance rate is 100%; 2. 员工年度人权政策培训覆盖率 100%。 Annual employee training coverage on human rights policies is 100%.	1. 至 2030 年, 员工年度培训平均学时 ≥40 小时; Achieve average annual employee training hours of ≥40 hours by 2030; 2. 关键岗位员工保留率提升至 85% 以上; Increase key position employee retention rate to above 85%; 3. 建立并运行覆盖全员、年受理率 >95% 的电子化申诉与反馈平台。 Establish and operate an electronic grievance and feedback platform covering all employees with an annual acceptance rate >95%.

目标管理说明：短期目标侧重合规底线与基础管理，长期目标侧重体系完善与文化深化，所有量化目标的测量与追踪将依赖于每年度人力资源数据系统与定期内外部审计，并每年进行评审和动态调整。

Objective Management Note: The short-term objectives focus on compliance baseline and basic management, while the long-term objectives emphasize system improvement and cultural deepening. The measurement and tracking of all quantitative objectives shall rely on the annual environmental performance data systems and regular internal and external audits, with annual reviews and dynamic adjustments.

五、传达、沟通与申诉机制 Communication, Consultation and Grievance Mechanism

思源每年通过发布 ESG 报告、平台披露与内外沟通渠道，对内全员培训。设立 ESG@sieyuan.com 专项邮箱、官网/公众号反馈入口，定期发布 ESG 报告，接受监督并持续加强 ESG 管理与透明度。

Sieyuan annually conducts internal training for all employees through ESG reports, platform disclosures, and internal & external communication channels. A dedicated email address ESG@sieyuan.com and feedback channels on the official website/WeChat official account are

established to regularly publish ESG reports, accept public oversight, and continuously strengthen ESG management and transparency.

我们为所有员工及外部利益相关方设立保密的(专项邮箱: ESG@sieyuan.com)。我们承诺对所有申诉进行独立调查,并在 15 个工作日内给予初步回应,30 个工作日内反馈解决方案,并严格保护举报者信息,杜绝任何形式的报复行为。

We have established a confidential (**dedicated e-mail: ESG@sieyuan.com**) for all employees and external stakeholders. We undertake to conduct independent investigations into all grievances, provide an initial response within 15 working days, communicate a resolution within 30 working days, and strictly protect whistleblower information and eliminate any form of retaliation.

对于违反本政策的行为,公司将依据情节严重程度、造成的损失及影响,采取包括但不限于警告、罚款、降职、解除劳动合同等内部处分;涉及违法犯罪的,依法移交司法机关处理。对于未履行管理责任导致辖区内发生重大合规风险或违规事件的管理者,将依法依规追究其领导责任。

For violations of this Policy, the Company will impose internal disciplinary actions, including but not limited to warnings, fines, demotions, and termination of labor contracts based on the severity, losses incurred, and its impact. Any violation involving illegal or criminal offenses will be transferred to judicial authorities in accordance with the law. Managers who fail to fulfill their management responsibilities, resulting in significant compliance risks or violations within their jurisdiction will be held accountable for their leadership in accordance with applicable laws and regulations.

六、政策更新与审查机制 Policy Update and Review Mechanism

年度审查: 人力资源与用工环境组(S)每年评估政策执行情况与目标达成度,并向可持续发展委员会报告。

Annual Review: The Human Resources and Workplace Environment Team (S) shall conduct an annual assessment of Policy implementation and target achievement, and report to the Sustainability Committee.

全面更新: 每三年或当法律法规、运营环境发生重大变化时,对政策进行系统性审查与修订。

Comprehensive Update: The Policy shall be systematically reviewed and revised every three years, or when there are significant changes to laws, regulations, or the operating environment.

动态调整: 本政策中的量化目标将每年评审,并可能根据业务发展及行业最佳实践进行适当调整。

Dynamic Adjustment: The quantitative targets in this Policy will be reviewed annually and may be adjusted appropriately in line with business development and industry best practices.

七、最高管理者承诺 Top Management Commitment

董事长承诺

Commitment from the Chairman

作为思源电气股份有限公司董事长暨最高管理者，在此郑重承诺：

As the Chairman and Top Management of Sieyuan Electric Co., Ltd., I hereby solemnly commit:

思源电气将坚定不移地尊重、保护并促进每一位员工的基本人权与劳工权利。我们视员工为最宝贵的资产，其尊严、健康、安全与发展是公司可持续发展的核心基石。

Sieyuan Electric will unwaveringly respect, protect and promote the fundamental human rights and labor rights of every employee. We regard our employees as our most valuable assets, and their dignity, health, safety and development constitute the core foundation of the Company's sustainable development.

董事会及管理层承诺，将严格履行企业人权尽责，将本政策所载明的国际公认原则全面融入公司战略、运营管理与文化实践。我们绝不使用任何形式的强迫劳动或童工，致力于提供公平的薪酬、安全健康的工作环境，并坚决反对一切形式的歧视与骚扰。

The Board of Directors and management commit to rigorously fulfilling corporate human rights due diligence, and fully integrating the internationally recognized principles set forth in this Policy into the Company's strategy, operational management and cultural practices. We will not tolerate any form of forced labor or child labor, are committed to providing fair compensation and a safe and healthy working environment, and firmly oppose all forms of discrimination and harassment.

我们将确保投入充足的资源，建立健全有效的管理体系与沟通机制，保障员工的结社自由与集体谈判权，支持工作与生活的平衡，并推动多元、平等、包容的组织文化建设。我们要求全球各级管理者以身作则，带头践行，确保本政策在每一个运营环节得到切实贯彻。

We will ensure the provision of sufficient resources to establish and improve effective management systems and communication mechanisms, safeguard employees' freedom of association and the right to collective bargaining, support work-life balance, and promote the development of a diverse, equitable and inclusive organizational culture. We require managers at all levels worldwide to lead by example and take the lead in implementation, so as to ensure the effective enforcement of this Policy in every operational process.

我们坚信，只有尊重并赋能员工的企业，才能赢得未来的竞争。思源电气将以此承诺为行动纲领，与全体员工及商业伙伴携手，共同构建一个真正公平、安全、包容且有尊严的工作环境。

We firmly believe that only enterprises that respect and empower their employees can win the competition of the future. Guided by this commitment, Sieyuan Electric will work together with all employees and business partners to build a truly fair, safe, inclusive and dignified working environment.

承诺人：

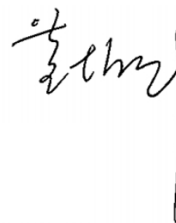
Committed by:

职务：董事长

Title: Chairman of the Board

日期：2026年4月1日

Date: April 1, 2026



八、版本控制记录 Version Control Record

版本号 Version No.	修订日期 Revision Date	修订原因 Reason for Revision	修订人/部门 Revised By/ Department	修订人/部门 Revised By/ Department	审批人/部门 Approved By/ Department
V1.0	2024.12.31	首次发布 Initial Release	高嘉婧/供应 链管理部/生 产管理部 Gao Jiajing/ Supply Chain Management Department/ Production Management Department	高春南/供应链管 理部/生产管理 部 Gao Chunnan/ Supply Chain Management Department/ Production Management Department	冒友建/供应 链管理部 Mao Youjian/ Supply Chain Management Department
V1.1	2025.12.15	内容增补完善、 管理目标调整 Content Supplementation, Management Objectives Adjustment	高嘉婧/供应 链管理部/生 产管理部 Gao Jiajing/ Supply Chain Management Department/ Production Management Department	高春南/供应链管 理部/生产管理 部 Gao Chunnan/ Supply Chain Management Department/ Production Management Department	冒友建/供应 链管理部 Mao Youjian/ Supply Chain Management Department

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Sustainability Committee