



SMOORE International Holdings Limited

Human Rights Policy

Chapter 1 General Provisions

Article 1 Purpose

This policy aims to strengthen SMOORE International Holdings Limited (hereinafter referred to as the "Company") in respecting and protecting human rights, integrate the concept of human rights into the entire business processes of the Company, including the R&D, production, supply chain management, and employee management of electronic atomization devices, electronic atomization products, and atomization technology solutions, fulfill corporate social responsibilities, safeguard the legitimate rights and interests of employees, supply chain partners, and relevant stakeholders, and promote the sustainable development of the Company.

Article 2 Scope of Applications

This policy applies to the Company and its subsidiaries, as well as all departments, employees, partners, and third-party institutions that carry out business activities on behalf of the Company. It covers all links involving human rights impacts in employee management, supply chain cooperation, business operations, etc., including but not limited to scenarios such as recruitment and employment, working conditions, and human rights management in the supply chain.

Article 3 Basic Principles

1. **Compliance Principle:** Strictly abide by internationally recognized human rights standards such as the *Universal Declaration of Human Rights* and the *Core Conventions of the International Labor Organization*, as well as labor and human rights-related laws and regulations in the countries/regions where the Company operates, to ensure that human rights protection is consistent with legal requirements.

2. **Equality and Respect Principle:** Respect the equal rights of all people, oppose any form of discrimination based on race, color, gender, religion, age, disability, sexual orientation, etc., and ensure fair treatment of employees, supply chain partners, and stakeholders in terms of human rights.
3. **Prevention and Protection Principle:** Establish a mechanism for identifying and preventing human rights risks, proactively investigate potential hidden dangers of human rights violations in business activities, and safeguard basic human rights from the source, such as prohibiting forced labor, eliminating the risk of child labor, and ensuring a safe and healthy working environment.
4. **Transparency and Co-governance Principle:** Disclose the Company's human rights policies and practices, actively communicate and collaborate with employees, supply chain partners, industry organizations, human rights institutions, etc., accept supervision, and jointly promote human rights protection work.

Chapter 2 Core Contents of Human Rights Protection

Article 4 Protection of Employee's Basic Human Rights

1. **Freedom of Association and Collective Bargaining:** We respect employees' freedom of association and right to collective bargaining, support employees in legally establishing or participating in trade union organizations, and resolve labor rights issues through reasonable channels of negotiation. We hold regular collective bargaining and negotiation meetings every year, covering issues such as labor remuneration, working hours, rest and leave, labor safety and health, welfare and insurance, employee development, rules and regulations, and rights protection, to build a bridge of equal dialogue between enterprise development and employees' demands.
2. **Forced Labor:** We are committed to ensuring that all work is voluntary. We take practical measures to prevent forced labor, debt bondage, indentured labor, involuntary prison labor, slavery, or human trafficking in our workplaces and

throughout the supply chain.

3. **Child Labor:** Within our organization, child labor will not be used under any circumstances. All employees must meet the minimum age requirements specified by local laws.
4. **Equal Employment and Non-discrimination:** We promise to provide equal employment opportunities to employees. No employee will be discriminated against in recruitment, promotion, training, remuneration, etc., because of race, color, gender, religious belief, age, nationality, disability, sexual orientation, or other legally protected characteristics. We are committed to creating a diverse and inclusive working environment where every employee can give full play to their potential.
5. **Workplace Health and Safety:** We are committed to creating an efficient workplace by minimizing the possibility of accidents, injuries, and exposure to health risks, and will work with employees to improve workplace health and safety conditions.
6. **Minimum Wage, Working Hours and Benefits:** We promise to provide employees with competitive remuneration with reference to the industry and local labor market levels. We strictly comply with applicable wage laws, including those related to minimum wage, overtime hours, and statutory benefits.
7. **Reasonable Working Hours and Rest:** We comply with statutory working hour standards, reasonably arrange overtime and compensatory leave; ensure employees' rights to statutory holidays, paid annual leave, etc., and avoid overwork.

Article 5 Human Rights Management in the Supply Chain

1. **Requirements for Suppliers' Human Rights:** Incorporate human rights standards into the supplier access, evaluation, and management system, require suppliers to comply with this policy and international/local human rights laws and regulations, and prohibit suppliers from engaging in forced labor, discrimination, neglect of employees' safety and health, etc.
2. **Supply Chain Supervision and Improvement:** Conduct regular human rights

compliance review on suppliers, identify risks through on-site inspections, document tracing, employee interviews, etc.; require suppliers with human rights issues to rectify within a time limit, terminate cooperation if necessary, and promote the overall improvement of human rights in the supply chain.

Article 6 Respect for Stakeholder's Human Rights

1. **Communities and the Public:** In business operations (such as factory construction, production activities), fully consider the impact on the human rights of residents in surrounding communities (such as impacts on environment, health, living order), and safeguard the legitimate rights and interests of the community public through communication and negotiation, public welfare actions, etc., to promote harmonious development.
2. **Customers and Consumers:** Ensure that product design, production, and service processes meet safety and health requirements, do not mislead or harm the rights and interests of customers/consumers; respect customers' privacy and data security, properly handle customer demands, and reflect the extended value of human rights protection.

Chapter 3 Implementation and Guarantee Mechanisms

Article 7 Organizations and Responsibilities

Division of functions among departments:

- Human Resources Department: Takes the lead in protecting employees' human rights, covering recruitment, training, management of working conditions, communication on employees' rights and interests, etc.
- Purchasing Department: Responsible for human rights review, supervision, and follow-up of rectification for suppliers.
- Legal Department: Provides support for compliance with human rights laws and regulations, and handles legal risks and disputes related to human rights.
- Other Departments: Implement the requirements of the human rights policy

within their business scope and cooperate with cross-departmental human rights management work.

Article 8 Training and Communication

1. **Internal Training:** Regularly carry out human rights training for employees, covering induction training for new employees, special training for management, on-the-job practical training, etc., to popularize human rights knowledge, policy requirements, and compliance points, and improve the human rights awareness and practical ability of all employees.
2. **External Communication:** Establish regular communication with industry associations, human rights organizations, academic institutions, etc., participate in discussions on human rights issues and best practices; disclose the Company's human rights policies and progress to suppliers, communities, investors, etc., respond to concerns, and accept supervision.

Article 9 Improvement and Accountability

1. **Problem Rectification:** For human rights issues found in monitoring and evaluation, clarify the responsible entity and rectification time limit, and formulate targeted improvement measures; establish a rectification tracking mechanism to ensure the closed-loop solution of problems, and simultaneously improve systems and processes to prevent the recurrence of similar problems.
2. **Accountability Mechanism:** Departments/individuals that violate the human rights policy, cause human rights violations, or major compliance risks shall be punished in accordance with the Company's disciplinary system; those involving intentional violations and damage to major rights and interests shall be seriously held accountable, and those with serious circumstances shall be transferred to judicial authorities for handling.

Chapter 4 Supplementary Provisions

Article 10 Policy Update



This policy is regularly evaluated and revised according to the development of international human rights standards, changes in laws and regulations, and the Company's business needs. It is issued and implemented upon approval by the Company's decision-making body.

Article 11 Effectiveness and Interpretation

This policy shall take effect from the date of issuance. The Company shall be responsible for its interpretation and supervision of policy implementation to ensure that the Company's human rights protection work continues to be in line with reality and effectively implemented.