

Goldwind Science & Technology Co., Ltd.

Labor and Human Rights Policy

General Provisions

Article 1 This Policy is formulated to strengthen the management of the Company's labor and human rights policy, to commit to compliance with and active support for international human rights initiatives including the Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, to strictly abide by human rights-related laws and regulations in the jurisdictions where the Company operates, and to uphold and respect the human rights and legitimate interests of every employee. In its operations and management, the Company prohibits child labor, forced labor and human trafficking; firmly opposes discrimination, harassment and other degrading conduct; provides employees with a safe and healthy workplace; provides employees with diverse learning and career development opportunities; and respects employees' right to freedom of association and the right to collective bargaining, so as to ensure the effective implementation of Goldwind's labor and human rights policy. This Policy sets forth the overall requirements of the Company with respect to labor and human rights, and guides the conduct of all related work, including:

(1) Providing guidance for the establishment of the Company's labor and human rights management procedures and operational protocols;

(2) Providing guidance for the handling of all types of labor and human rights incidents, and preventing and mitigating losses arising from such incidents;

(3) Educating and training all employees on the completeness and availability of the Company's labor and human rights framework and related protection measures.

Management Responsibilities

Article 2 Group Chief Talent Officer

(1) Responsible for approving the Company's labor and human rights objectives, guidelines, plans and policies;

(2) Overseeing the development of the Company's labor and human rights framework;

(3) Approving relevant investment budgets for labor and human rights initiatives.

Article 3 Human Resources Center

(1) Drafting and revising labor and human rights policy content, ensuring that all provisions and standards are accurate and precise;

(2) Responsible for the unified planning and development of the Company's labor and human rights function, and supporting company-level labor and human rights decision-making;

(3) Responsible for conducting regular labor and human rights risk audits and issuing audit and rectification reports.

Article 4 Responsibilities of Bases, Business Divisions and Subsidiaries

(1) Further refining and implementing their respective labor and human rights frameworks in accordance with the guiding principles of this Policy;

(2) Guiding and training their respective subsidiaries on labor and human rights execution, ensuring the effective implementation of this Policy;

Article 5 Employee Responsibilities

(1) Using relevant information appropriately within the scope of the Company;

(2) Bearing responsibility and obligation to protect the Company's labor and human rights interests;

(3) Cooperating with investigations and handling of matters related to the Company's labor and human rights.

Review and Revision

Article 6 This Policy shall be reviewed annually to verify its applicability and effectiveness. The next scheduled review: August 2027.

Article 7 This Policy shall undergo comprehensive revision every three years to

ensure alignment with evolving laws, regulations and labor requirements; in the event of significant changes in laws, regulations or labor requirements, revisions may be advanced to ensure timely compliance.

Scope of Application

Article 8 This Policy applies to, without limitation, Goldwind and other stakeholders affected by the Company's operations, including suppliers and business partners.

Policy Content

Article 9 Prohibition of Child Labor

(1) Goldwind has established systems including the Administrative Measures for Recruitment and Employment, and strictly prohibits the employment of child labor under the age of 16 (or the higher age prescribed by applicable local laws and regulations), and provides necessary protections for minors;

(2) The Company strengthens the audit and oversight of supply chain partners to ensure that child labor and forced labor are absent throughout the supply chain;

(3) Goldwind incorporates the prohibition of child labor into its Supplier Code of Conduct, and will take disciplinary action and directly terminate suppliers found to employ child labor;

(4) In the event that child labor is inadvertently employed, the Company shall immediately implement remedial measures: cease the child's work immediately and arrange for a health examination; disburse all due wages in full; make appropriate arrangements and escort the child back to his or her guardian, bearing all related expenses; provide financial assistance and educational support as needed; take disciplinary action against responsible personnel; and conduct a thorough root-cause investigation and implement corrective measures to prevent recurrence.

Article 10 Elimination of Forced Labor

(1) Goldwind attaches paramount importance to personal freedom, prohibits all forms of forced labor including intimidation, threats, abduction and fraud, safeguards

employees' right to freely choose and terminate employment, prohibits retaliatory action against employees who resign, and shall not unlawfully withhold employees' identification documents;

(2) Goldwind conducts supplier due diligence on matters including forced labor and working hours to ensure that suppliers respect labor rights and promote labor compliance throughout the supply chain.

Article 11 Working Conditions

(1) Goldwind is committed to providing employees with fair remuneration and comprehensive labor protection, establishing sound labor protection systems, formulating employment procedures in compliance with applicable laws and regulations, and executing labor contracts in a timely manner;

(2) Goldwind implements a five-day workweek with standard working hours of 40 hours per week; any hours worked beyond this standard are deemed overtime. The Company has established a working hours management mechanism to strictly control the duration and frequency of overtime, and does not require employees to work overtime on a compulsory basis. The Company does not encourage overtime; where overtime is required for urgent and essential work, overtime approval procedures shall be followed. Daily overtime shall not exceed 3 hours, weekly overtime shall not exceed 12 hours, and monthly cumulative overtime shall not exceed 36 hours;

(3) The Company ensures that employee wage levels meet or exceed the local minimum wage standard, and adjusts compensation periodically based on the Company's business performance, employee performance and market compensation levels. The Company has established a performance-based variable compensation mechanism for all employees, under which all regular employees are eligible for variable compensation linked to individual performance outcomes;

(4) The Company has established a tiered and categorized employee benefits system. For full-time employees, the Company provides comprehensive benefits

including, without limitation, social insurance, housing provident fund and paid annual leave (during which employees receive their regular wages in accordance with applicable law), complemented by holiday benefits, employee training and development opportunities, and other programs designed to safeguard employee rights and interests and enhance quality of life and job satisfaction. Part-time employees are entitled to corresponding statutory benefits in accordance with national laws and regulations and the terms of their employment agreements; enterprise supplementary benefits are provided on a case-by-case basis.

(5) Goldwind is committed to providing employees with diverse learning and career development opportunities, adhering to the talent management principle of "promoting the capable, repositioning the average, and replacing the incompetent", establishing both horizontal and vertical career development pathways, designing customized training programs for employees at different levels, and encouraging employees to pursue further academic and professional development.

Article 12 Promoting Diversity and Inclusion

(1) Goldwind is committed to treating all employees with dignity and respect, upholding the principle of equal employment opportunity, fostering an inclusive, equitable, caring and amicable work environment, and prohibiting all forms of violent discipline against employees (including mental or physical threats, punishment, retaliation and verbal abuse);

(2) The Company is committed to providing equal employment opportunities to all job applicants, without discrimination on the basis of race, gender, age, religious belief, nationality, disability, sexual orientation, marital status or political opinion;

(3) The Company maintains a zero-tolerance policy toward all forms of discrimination (including, without limitation, gender, race, age, skin color, religion, language and ethnicity) and harassment (including non-sexual and sexual harassment). Employees or relevant parties who become aware of any form of discrimination or harassment in the course of work may report it to Goldwind through

the channels specified in Article 24 of this Policy. Goldwind will address such reports in a timely manner in accordance with applicable laws, regulations and internal policies.

Article 13 Respect for Freedom of Association

(1) Goldwind respects employees' right to freedom of association and the right to participate in trade unions, and respects employees' right to collective bargaining with the Company;

(2) Goldwind maintains open channels for employee democratic participation, encourages employees to participate in the Company's operation and management, and safeguards employees' rights to information, expression, participation, consultation and supervision on matters affecting their interests;

(3) The Company strictly prohibits any form of intimidation, harassment, retaliation or violence against trade union members. No management personnel or employee shall engage in intimidation, threats, insults, harassment, ostracism, retaliation or violence against any person for exercising the right to freedom of association, participating in trade union activities or holding a trade union position. Violators shall be subject to disciplinary action by the Company in accordance with the severity of the circumstances; those suspected of criminal conduct shall be referred to judicial authorities.

Article 14 Occupational Health and Safety

(1) The Company strictly adheres to international occupational health and safety standards and initiatives, including the ILO Occupational Safety and Health and the Environment Convention, as well as applicable laws and regulations in the jurisdictions where it operates;

(2) The Company provides safe and hygienic working and living conditions, and undertakes occupational hazard monitoring, employee occupational health surveillance, provision of personal protective equipment, and occupational health education and training to ensure employee safety and health;

(3) The Company provides employees with a safe and healthy working environment, adheres to the safety management policy of "safety first, prevention-oriented, comprehensive governance", and continuously advances the development of a long-term work safety mechanism to protect employees' occupational health and safety. The Company is committed to the continuous improvement of its occupational health and safety management system, to continuously enhancing its occupational health and safety management standards, and to ensuring the participation of employees and employee representatives in occupational health and safety consultations and continuous improvement processes. The Company actively establishes occupational health and safety performance targets, and formulates, revises and dynamically tracks performance improvement targets based on current occupational health and safety performance and the Company's operational realities.

Article 15 Career Development and Training

(1) The Company is committed to enhancing employees' professional skills, knowledge and comprehensive capabilities through the provision of extensive training and development opportunities;

(2) The Company provides career planning guidance services and conducts regular performance evaluations to assist employees in setting and achieving their individual career goals;

(3) Based on fair evaluation of employee competence and performance, the Company ensures that all employees have equitable access to promotion opportunities, inter-departmental mobility opportunities and various incentive programs, thereby further expanding career development possibilities.

Article 16 Protection of Female Employees

(1) With respect to female employees, the Company shall not refuse employment or raise employment standards for women, except for types of work or positions that are statutorily unsuitable for women. The Company shall not dismiss, reduce the salary or position of, or force pregnant employees to perform work contraindicated

during pregnancy on account of pregnancy. The Company shall strictly implement the Special Provisions on Labor Protection of Female Employees, practicing gender equality and equal pay for equal work;

(2) When organizing employees for off-site advanced study, professional training, on-the-job training, overseas inspection or secondment, the enterprise shall ensure the participation of a proportionate number of female employees.

Article 17 Protection of Persons with Disabilities

The Company provides protection for persons with disabilities and shall not discriminate against persons with disabilities, except where statutory medical conditions preclude employment. The Company shall also make reasonable modifications to workplaces, work equipment and living facilities in accordance with actual needs.

Disciplinary Action

Employees who violate laws or the Company's labor and human rights management policy shall, in addition to any legal penalties, be subject to prompt and appropriate disciplinary action. Such action includes, without limitation, written warnings, demerits, demotion and termination of employment. The Company expects every employee to uphold high standards of responsibility and ethics, and to jointly safeguard the reputation and interests of the enterprise.

Continuous Improvement

The Company shall continuously improve its labor and human rights management policies to adapt to evolving market conditions and legal requirements. The Company also encourages employees to actively participate in human rights development and to jointly uphold the Company's corporate culture and values.

Quantitative Indicators

Target Indicator		Review Department
Human Rights Training	Using 2025 as the baseline year, from 2026 to 2028, maintain 100% annual	Human Resources Center

	coverage of training on anti-discrimination and anti-harassment, prohibition of child labor and forced labor, freedom of association, occupational health and safety, and equality and diversity; by 2028, increase average training hours per employee by 20% compared to the baseline year.	
Violation Incidents	Using 2025 as the baseline year, from 2026 to 2028, maintain zero incidents of child labor and forced labor. Maintain 100% annual coverage of special training on child labor and forced labor prevention. Initiate special corrective actions immediately if relevant incidents occur.	Human Resources Center
Internal Audit	Using 2025 as the baseline year, expand the scope of internal labor human rights audits year by year, and achieve full coverage of labor human rights reviews across all workplaces by 2028.	Human Resources Center
Health and Safety	Taking 2025 as the baseline, the 2030 Occupational Health and Safety (OHS) performance targets are set as follows: the Total Recordable Incident Rate	Human Resources Center / Safety and Environmental Protection Department

	(TRIR, cases per million hours worked) and Lost Time Incident Rate (LTIR, cases per million hours worked) shall decrease by 10% compared with the baseline year; the participation rate of employee health activities, occupational health and safety physical examination rate, and completion rate of safety training programs shall remain at 100% annually from the baseline year to 2030.	
Freedom of Association	Using 2025 as the baseline year, from 2026 to 2028, maintain 100% coverage of employee voting rights, 100% coverage of collective agreements, and 100% response rate for employee feedback.	Human Resources Center
Employee Satisfaction	Using 2025 as the baseline year, from 2026 to 2028, the annual employee satisfaction score shall be ≥ 4.2 on a 5-point scale to sustain a high level of satisfaction.	Human Resources Center
Career Planning	Using 2025 as the baseline year, from 2026 to 2028, the company shall have no fewer than 5 employees promoted internally to	Human Resources Center

	management positions, and maintain 100% annual coverage of skills training.	
Working Conditions	Using 2025 as the baseline year, from 2026 to 2028, maintain 100% coverage of employees' social insurance and medical insurance, maintain 100% labor contract signing rate, and keep the annual employee turnover rate $\leq$ 10%.	Human Resources Center

Remedy and Supervision Mechanism

Article 18 Child Labor Remediation Procedures

(1) Identification of response measures for violations: upon discovery of child labor under the age of 16 (or the higher age prescribed by local law), the child shall be immediately removed from work and a designated person shall arrange for a health examination;

(2) Monitoring the effectiveness of remedial measures: contact shall be made with the child's parents or immediate family members; a designated person shall escort the child back to the place of registered residence; the child's family circumstances shall be assessed; and financial assistance shall be provided where necessary to support the child's completion of compulsory education.

Article 19 Discrimination and Harassment Remediation Procedures

(1) Identification of response measures for violations: upon discovery of discrimination or harassment incidents involving employees, the Company shall immediately collect relevant evidence and establish a dedicated investigation team to facilitate inquiry and evidence-gathering by the relevant departments;

(2) Monitoring the effectiveness of remedial measures: following confirmation of an incident, the Company shall impose appropriate disciplinary measures including, without limitation, counseling, written warning, job transfer, suspension and termination of employment, to ensure that personnel involved are not subjected to retaliation. Victims shall be provided with comprehensive support including financial and psychological assistance and paid sick leave, and shall be reinstated to normal work upon full recovery.

Article 20 Scope of Human Rights Remediation

The scope of the Company's human rights remediation includes, without limitation: discrimination, harassment, forced labor and other infringements of rights and interests suffered by employees in the course of employment; environmental, health and other rights impacts on community residents resulting from the Company's operational activities; human rights harms suffered by workers in the supply chain; and other human rights damage situations caused by the Company's acts or associated acts.

Article 21 Victim Support and Protection

(1) Psychological support: promptly arrange professional psychological counseling and therapy services for victims, with continuous follow-up on their psychological recovery progress;

(2) Medical support: bear all relevant medical and health examination costs arising from human rights harm;

(3) Work accommodation: for employee victims, provide reasonable work adjustment plans based on their wishes and actual circumstances, including position reassignment, working hours adjustment or remote work arrangements;

(4) Privacy protection: strictly safeguard the personal privacy and information security of victims throughout the handling process;

(5) Ongoing care: provide continuous monitoring and support to victims, regularly assess their recovery progress and practical needs, and dynamically adjust support plans accordingly.

Article 22 Cooperation with Judicial Authorities and Non-Governmental Mediation

The Company commits to actively cooperating with judicial authorities, labor supervision departments and other competent authorities in the investigation and handling of human rights violation incidents, truthfully providing relevant information and evidence, and fully supporting law enforcement efforts. The Company respects and supports victims in seeking remedies and resolutions through

non-governmental mediation institutions (including, without limitation, labor dispute mediation committees, arbitration institutions, industry mediation organizations and other neutral third-party mediation institutions), and shall not obstruct victims in the exercise of their legitimate remedy rights. The Company is willing to resolve human rights disputes amicably through non-litigious means such as mediation and settlement on the basis of equality and voluntariness, and to effectively safeguard the legitimate rights and interests of victims.

Article 23 Supply Chain Human Rights Remediation

(1) The Company requires upstream business partners (including suppliers, contractors and service providers) to commit to establishing human rights remediation systems and to complying with internationally recognized human rights standards and the laws and regulations of the countries and regions in which they operate;

(2) The Company incorporates human rights protection requirements into supplier access evaluation criteria, specifies human rights protection clauses and breach liabilities in contractual agreements, and conducts regular supplier human rights audits;

(3) The Company and its partners jointly conduct human rights remediation: establishing information-sharing mechanisms and jointly conducting investigations and evidence collection; jointly developing and implementing remediation plans for human rights incidents involving multiple parties; and providing partners with human rights training and capacity-building support;

(4) The Company shall terminate business relationships with suppliers that fail to implement effective rectification or that seriously violate human rights standards.

Article 24 Supervision Mechanism

Upon discovery of any incident violating the above principles or receipt of any related complaint or report, the Company shall respond in a timely manner, implement remedial measures for the parties concerned, and refer incidents suspected of violating the law to judicial authorities for handling.



Employees of the Company, external stakeholders and their employees may all report suspected violations of this Code through the channels set forth below.

Reporting Channels:

Workplace Reporting Box

Tel: 86-010-67511888-1127

Email: Audit@goldwind.com.cn

We solemnly undertake that every report will receive the highest attention and a timely response, and that all matters will be handled appropriately. The Company shall also strictly protect the personal information of reporters to ensure that their rights and interests are not infringed. Let us work together to advance the cause of labor and human rights, and contribute to building a greener and more sustainable future.

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August 26, 2026