



Human Rights Policy

Dah Chong Hong Holdings Limited ("the Group") values human rights and dignity. The Group is committed to upholding and promoting high ethical standards related to human rights and dignity across all our business operations, supply chains, and the communities in which the Group operates.

The Group align the commitment with the internationally recognised frameworks:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Universal Declaration of Human Rights (UDHR)
- The International Labour Organization (ILO) Core Conventions
- The OECD Guidelines for Multinational Enterprises

The Group is also assisting and expecting all staff, suppliers, contractors, vendors, and business partners to follow or refer to the policy, in support of sustainable development and creation of a better future within our communities.

Scope of the Policy:

- This policy applies to all business units within the Group. In cases of conflict or inconsistency with local laws, regulations and standards, amendments will be made to ensure compliance with both local and Hong Kong laws.
- This policy serves as the foundation for our approach to integrating human rights considerations into our daily operations, risk management and stakeholder engagement practices. All business units should adhere to this policy and, when necessary, develop their own policies based on it to comply with ethical standards related to human rights and dignity more effectively.

The Group Human Rights Policy:

1. Human Rights Principles

The Group is committed to complying with the following human rights principles across all jurisdictions in which we operate:

- i. **Prohibition of Human Trafficking and Modern Slavery:**
 - The Group maintains zero tolerance for all forms of human trafficking and exploitation.
 - The Group strictly prohibit any forced, bonded or involuntary labour, as well as the retention of employee identity documents or passports.



ii. **Prohibition of Forced and Child Labour:**

- The Group strictly prohibits the employment of any children below the minimum legal working age.
- The Group is fully safeguarding the rights of children and maintains zero tolerance for child labour and forced labour.
- The Group promptly suspends any individual suspected of being involved in any case of employment of a child or forced labour and the Group will handle and investigate the case strictly in accordance with legal requirements to ensure that such violations are effectively curbed and not repeated.

iii. **Freedom of Association and Collective Bargaining:**

- The Group fully respects the decisions of employees to join or not join associations or trade unions, and to participate in collective bargaining, where legally permitted.

iv. **Non-Discrimination and Equal Opportunity:**

- The Group does not tolerate any form of discrimination, harassment, violence, intimidation, threats or other breaches of applicable employment laws.
- As an equal opportunity employer, the Group also promotes diversity, equity, and inclusion in the workplace. Every job applicant and employee, regardless of race, colour, nationality, gender, marital status, family status, pregnancy and breastfeeding status, or disability, has the right to obtain fair employment opportunities based on ability and performance.
- The Group committed to providing equal pay for work of equal value, ensuring that there is no discrimination between men and women in remuneration and benefits.

v. **Safe and Healthy Working Conditions:**

- The Group provides a safe, healthy and secure working environment for all, and strives to achieve zero harm in the workplace.

vi. **Reasonable Working Hours and Wages:**

- The Group ensures that employees receive wages that meet or exceed legal requirements.
- The Group ensures that all employees have the right to paid annual leave in accordance with local labour laws and the Group's policies.
- The Group complies with all applicable laws and regulations regarding working hours and rest periods. The Group will take actions to prevent overtime or excessive working hours to ensure workers have sufficient rest and recovery time, and to



safeguard their health and wellbeing.

vii. **Respect for Community and Land Rights:**

- The Group fully respects the rights of local and indigenous communities. The Group will consider the impacts of its products, services and operational activities, and strive to avoid negative impacts on these communities.

2. Human Rights Due Diligence

The Group integrates human rights considerations into its risk management system:

- The Group conducts human rights impact assessments regularly to identify and assess potential human rights risks in its operations and supply chain.
- The Group actively controls and minimises the significant negative human rights impacts (including potential impacts) identified to prevent harm to communities, stakeholders and individuals.
- The Group encourages and expects suppliers and business partners to align with the standards of the Group's policies to respect human rights.

3. Groups at Risk of Human Rights

The Group understands that specific groups within its operations and value chain may be exposed to higher human rights risks. The Group prioritises the severity of potential impacts and will allocate additional resources to the following high-risk groups or scenarios to address the significant risks:

- I. **Children:** The Group fully respects children's rights and ensures they are protected from child labour. The Group strictly prohibits child labour in its operations or supply chain. The Group expects all suppliers and business partners to strictly comply with legal requirements and labour standards.
- II. **Group's Employees:** The Group ensures that employees enjoy reasonable working hours and legal remuneration, provides a safe and healthy working environment and strictly prohibits discrimination or harassment against Group's employees.
- III. **Women:** The Group ensures gender equality and equal opportunities, and implements mechanisms to prevent harassment, thereby protecting women's rights and safety.
- IV. **Third-party employees:** The Group encourages and expects suppliers and business partners to align with the standards outlined in the Group's policies to respect human rights. The Group monitors and evaluates the performance of suppliers from time to



time and implements rectification actions when deemed necessary to ensure that third-party employees are protected.

- V. **Local Communities:** The Group fully respects the rights of the communities in which the Group operates. The Group will consider the impacts of its business activities on the local communities and communicate with the communities to prevent negative impacts from the operations to the local communities in a timely manner.

4. Grievance Mechanisms and Remediation

The Group has implemented the following mechanisms to ensure that any individuals affected can raise their concerns and receive fair and transparent remedial actions in a timely manner:

- Established easily accessible and secure channels. The individuals can report their concerns to the Audit Committee via email at auditcommittee@dch-holdings.com.
- The Group provides confidentiality and anonymity options to protect the identity and privacy of Whistle-blowers. The Group will make every effort to protect the Whistle-blower's identity and information in a confidential manner and, above all they will be protected against retaliation. "Retaliation" means any act of discrimination, reprisal, harassment, threat, punishment or penalty against the Whistle-blower.
- The credibility, materiality and verifiability of information and documentary evidence provided by the Whistle-blower will be critically reviewed. The Handling Team or the Committee will also consider whether the disclosure has been made on the basis of reliable information and in good faith. Where the preliminary evaluation reveals tangible and credible information, a full investigation will be launched.
- The Group will promptly take remedial and corrective actions when any negative impacts or potential risks to human rights are identified. The Group will give priority to conducting remediation actions for those already affected. The remedial and corrective actions (including compensation, restoration of status, cessation of violations) are fair, timely, transparent, and in line with the interests of the victims.

5. Human Rights Training and Awareness

The Group is committed to providing appropriate human rights training to employees, management, and stakeholders to increase their awareness and understanding of human rights risks, policy requirements, and their responsibilities, ensuring alignment with the values of the Group.



Policy Formulation, Review, and Improvement:

- The policy is formulated by the Group's ESG Working Group in collaboration with relevant departments and is published with the authorisation of the management.
- The policy will be reviewed by the Group's ESG Working Group and relevant departments within the Group annually or as deemed appropriate. The Group will regularly collect staff feedback, communicate with stakeholders, and amend the policy as appropriate to ensure its effectiveness, feasibility, and sustainability.

Last Updated Date: November 28, 2025

Last Review Date: November 28, 2025