

# FIH MOBILE GLOBAL CODE OF CONDUCT

## 1. STATEMENT

FIH Mobile Limited (hereinafter referred to as the "Group", "the Company" and "FIH") takes care, confidence, determination and integrity as the common core values of the Group, which are reinforced by the actions and attitudes of its employees to help create economic growth under the vision of achieving corporate sustainable operation, fulfilling social citizenship responsibilities, and working together with global brand customers to create a comprehensive smart life and the enhance of human well-being.

The company aims to create corporate resilience, competitive advantages, and become the most trusted and reliable partner of customers, suppliers, employees, shareholders, and relevant stakeholders, with the business concept of "upholding employee-oriented, adhering to integrity and respect, taking the world as the stage, and deeply developing sustainable management", and the business principle of "continuous innovation and cooperation, achieving efficient operation, implementing the pursuit of quality, and concerning on labor and safety".

As a member of the Foxconn Technology Group, which is a member of international business community and the RBA, the Group recognizes and is committed to social and environmental responsibility. The objective of the Group's overall policy with regard to CSR is to provide a reference point to guide all FIH global facilities, including all management and employees, on the elements that drive the conduct of FIH's business and relationships with the world in which it operates. The companies covered by this Code of Conduct (hereinafter, "CoC") include companies in FIH Mobile Limited and other legal entities, companies or any form of business organizations which are controlled by FIH Mobile Limited.

Codes set out in this CoC policy were derived from three disciplined sources which are: (a) the member obligations of the industrial associations and the RBA, and the international standard institutes to which FIH's business is related; (b) the laws covering national regions where FIH deploys operations; and (c) the internal leadership of FIH who determine voluntary upgrading of performance standards. Each source represents a different commitment level of FIH's promised delivery to the diverse stakeholders, which include FIH's employees, customers, suppliers, the community, investors, and non-governmental organizations.

In recognizing inherent discrepancies that may exist among the above three sources, FIH pledges to live up to the most stringent rules based on whichever source determines a higher standard. On the policy level, none of FIH's documented codes should override local laws, and all the codes should defer substantially to any national and international organization whose provisions subsume FIH's operational or product areas. In terms of policy implementation, FIH should on a continuous and constant basis compare its Global CoC policy with the provisions set by international organizations and local applicable laws. To ensure compliance with such provisions and laws, FIH should honor the above principle as paramount in any version of the CoC policy and should work closely with local law-enforcement entities to close any gap between the released CoC policy and the current law. Any non-conformance with laws should be notified to customers together with continuous improvement plans so as to achieve industrial collaboration, improve capability building programs and establish industrial benchmarking.

FIH is hence committed to ensuring that our business is in all respects conducted in conformance with ethical, professional and legal standards. With the aim of becoming a CSR compliant supply chain partner with customers, FIH declares in its CoC policy to respect all industrial rules, applicable laws, human rights, environmental conservation, and safety of products and services in the countries and regions in which it operates, and to conduct its business activities in an honest and ethical manner. Simultaneously, FIH's downstream suppliers are required to comply with this CoC policy to the same level of standards which the supply-chain partners and industrial associations set for the ICT industry.

## **2. PURPOSE**

This CoC policy, for internal purposes, is to make CSR and Sustainability become part of the Group's core competencies. For external purposes, this CoC is to demonstrate FIH's core values of global operation. Maintaining high standards for implementing the CoC policy is FIH's goal, to ensure continued customer trust in us and to enhance FIH's image as a competitive company in the industry in both business and CSR and Sustainability respects.

## **3. RESPONSIBILITIES**

This Code is to set up the standards which FIH will support and be guided by in the conduct of its business. It determines the responsibilities of the Group's functionaries and business groups in substantiating the CoC principles. The Chairman of the FIH ESG Committee and the FIH ESG Task Force Team will monitor adherence to this CoC policy under the guidance of the Chairman. The teams responsible for sustainability of all subsidiaries and factories are responsible for entrenching and monitoring compliance with this Code and providing feedback to ESG Committee regarding local practices contravening the CoC policy.

Meanwhile, FIH ESG Committee continues to develop an internal validation audit mechanism to ensure conformance with and fulfillment of this CoC policy on the international scale in which FIH operates. General managers/principles of all subsidiaries and factories should require related management who are most tied to the local conditions and constraints to build capabilities in both CSR and Sustainability training and auditing knowledge to promote the audit mechanism. FIH internal audits are carried out by using internal professional staff teams or by resorting to external third-party service institutes annually or quarterly as per the Group's demands. Audits cover the areas of labor, ethics, environment, health and safety, and CSR and Sustainability management systems, which are required under the RBA standard.

#### **4. SCOPE**

This CoC policy applies to all sites of FIH worldwide. Given that FIH embodies all entities defined by both the concepts of legal incorporation and business operations, the term “site” here refers to locations of any entities incorporated by companies or subsidiaries where FIH possesses major shareholding and management operations. FIH Mobile Limited, the parent company, is set as the top driver for the scope of this CoC policy; and the scope should not be limited to manufacturing entities, but also include all the various FIH business units, companies and subsidiaries.

Failure to comply with this Code will be taken seriously and, depending upon the circumstances, could result in disciplinary action. To ensure that all business units around the world manage and conduct their business in line with the CoC policy, all subsidiaries and factories will determine how this CoC policy impacts on their operations and report periodically. All subsidiaries and factories are required by this CoC policy to report on their performance against this standard annually, submit corresponding improvement plans, and jointly work with FIH ESG Committee on social and environmental events related to the matters specified in this CoC policy.

#### **5. CoC STANDARD**

The CoC policy is founded on the basis of FIH's CSR and Sustainability philosophy and is composed of eight sections. Section one sets out FIH's standards relating to business ethics. Sections two, three, and four respectively detail the standards on labor and human rights, health and safety, and the environment. Section five specifies the elements of a minimally acceptable management system to enable conformity to this CoC policy. Sections six, seven, eight and nine state the Group's policy on responsible sourcing of minerals, anti-corruption, anti-trafficked & forced labor, and community engagement which are mandated to be obeyed in the Group.

## **I. Ethics**

To meet social responsibilities and to achieve sustainable development, FIH upholds the highest standards of ethics.

FIH's Ethic Codes includes:

### **1) Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. FIH shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. Any and all forms of corruption, extortion and embezzlement are strictly prohibited, and result in immediate termination of services and legal action.

### **2) Disclosure of Information**

All business dealings should be transparently performed and accurately reflected on FIH's business books and records. Information regarding FIH's labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

### **3) No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, including items such as cash or cash equivalents, entertainment, gift cards, product discounts, and non-business activities, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### **4) Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld.

### **5) Protection of Identity and Non-Retaliation**

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Anonymous complaints with clear and specific descriptions of person/time/place/event are to be accepted and protected. FIH should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

**6) Intellectual Property**

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

**7) Privacy**

FIH is to commit to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. FIH is to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

**II. Labor and Human Rights**

FIH is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. The company establishes effective grievance mechanism in order to protect labor rights better and adopt remedy and corrective actions in time. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The recognized standards such as the Universal Declaration of Human Rights (UDHR), the International Labor Organization (ILO) and the Ethical Trading Initiative (ETI) have been used as references in preparing this Code.

FIH's Labor and Human Rights Codes include:

**1) Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities, including but not limited to, workers' dormitories or living quarters. As part of the hiring process, workers must be provided with a written employment agreement in their native or familiar language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or

better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents and sub-agents' may not hold or otherwise destroy, conceal, confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker. The company should ensure that the labor dispatch companies it cooperates with comply with laws and regulations.

## **2) Child Labor Prohibition and Young Workers Protection**

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. FIH shall implement an appropriate mechanism to verify the age of workers. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. FIH shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. FIH shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance or remediation is provided.

## **3) Protection of Maternity Rights and Health of Female Workers**

FIH is committed to protecting female workers' rights and health. Health protection at work, maternity leave, social benefits, breast-feeding breaks, and protection against dismissal and discrimination based on maternity should be provided. It is unlawful to terminate the employment of a female worker during her pregnancy or absence on maternity leave. Female workers shall be entitled to have a period of maternity leave of no less than the legal requirement. A woman is guaranteed the right to return to the same or equivalent position paid at the same rate at the end of her maternity leave. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

**4) Non-Discrimination and Non-Harassment**

FIH is committed to a workforce free of harassment and unlawful discrimination. FIH shall not engage in discrimination and harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

**5) Humane Treatment**

There is to be no harsh and inhumane treatment including violence, gender-violence, any sexual harassment or other harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shame or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

**6) Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

**7) Working Hours**

FIH recognizes that unreasonable overtime for workers will result in reduced productivity, increased turnover, and increased injury and illness rates. Except in emergency or under some unusual situations, a workweek shall be not more than 60 hours per week, including overtime. Workers shall be allowed at least one day off every seven days worked as stipulated in the RBA CoC. Based on that minimum requirement, FIH shall also comply with local laws in this regard and develop gap-closing and improvement plans on a continuous basis that are made known to the business group management. FIH shall also conduct review/discussion sessions with key stakeholders including employees, law enforcement agencies and relevant customers to ensure legal observance globally and locally. In addition, overtime shall be voluntary, and vacation, leave periods, and holidays should be rendered consistently with applicable laws and regulations.

**8) Freedom of Association**

In conformance with local law, FIH respects the right of all workers to form and join labor unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

**III. Health and Safety**

FIH recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. The company is committed to obtaining and promptly renewing all necessary health and safety permits, complying with national or local regulations, to establish a safe and healthy working environment.

Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

FIH's policy on health and safety includes:

**1) Machine Safeguarding**

Safety risks and hazards should be identified and assessed on production machinery and other machinery. Physical guards, interlocks and barriers are to be provided and regularly tested and maintained where machinery presents an injury hazard to workers. Safety protection devices should be able to provide protection for machine operator, non-operating employees and employees responsible for repair, maintenance and debugging. All machinery and equipment in the workplace should have safe operating procedures, safety warning signs and risk notification cards, and employees should be trained to ensure their understanding.

**2) Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. If any potential hazards were identified, participants shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.



Change management procedures should be established when there is changing existing process, introducing production line, or producing new product, and measures should be taken to prevent new occupational hazards from the change.

### **3) Occupational Safety**

Worker potential for exposure to health and safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards.

### **4) Emergency Preparedness**

The company shall set up equipment and facilities to prevent the expansion of disaster accidents according to the requirements of the local government, such as fire monitoring and automatic fire extinguishing facilities. Equipment and facilities shall be well maintained and functioning properly. The company also should formulate disaster emergency rescue plans and disposal plans. Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, information for emergency responders and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent.

### **5) Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational incidents and near misses, including but not limited to work-related injuries and illnesses by encouraging worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

### **6) Infectious Disease Preparedness and Response**

The company shall develop and implement a plan to take reasonable steps to prepare for, prevent, and respond to the potential for an infectious disease among its employees.

**7) Ergonomics**

Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled. The integration of human factors via reasonable evaluation is to increase staff efficiency and reduce work accidents.

**8) Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

**9) Health and Safety Communication**

FIH shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise health and safety concerns without retaliation.

**IV. Environment**

All activities of FIH shall be carried out with respect for the environment. FIH's three main areas of environmental impact are products, campus sites, and ecology. The first two areas are accounted for in our following codes and implementation guidelines, whereas the third area is concerned with developing programs in accordance with the CoC policy on the environmental protection. Recognized management systems such as ISO14001 and the Eco Management and Audit System (EMAS) have been used as references in preparing this Code and may be a useful source of additional information.

FIH's environmental standards include:

**1) Environmental Permits and Reporting**

All required environmental permits (e.g., discharge permits), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

**2) Materials Restrictions**

FIH is to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

**3) Hazardous Substances**

Chemicals, waste and other materials posing a hazard to humans or the environment are to be identified, labeled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

**4) Solid Waste**

FIH shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

**5) Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. FIH shall conduct routine monitoring of the performance of its air emission control systems.

**6) Boundary Noise Management**

The company shall identify, control, monitor, and reduce noise generated by the facility that affects boundary noise levels.

**7) Pollution Prevention and Resource Reduction**

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

**8) Water Management**

FIH shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. FIH shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal

performance and regulatory compliance. Meanwhile, the company shall prevent illegal discharges and spills from entering storm drains, the public water supply, or public bodies of water.

### **9) Energy Consumption and Greenhouse Gas Emissions**

FIH is to establish a corporate-wide energy consumption and greenhouse gas reduction goal. Energy consumption and all relevant greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. FIH is to look for cost-effective methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.

## **V. Management systems**

FIH has established management systems whose scopes are related to the content of this Code. The management systems shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. The management systems should also facilitate continual improvement.

FIH's requirements on management systems include:

### **1) Company Commitment**

A corporate social and environmental responsibility policy statements affirming FIH's commitment to compliance and continual improvement, endorsed by top management and posted in the facility in the local language.

### **2) Management Accountability and Responsibility**

Clearly identify company representatives responsible for ensuring implementation and periodic review of the status of the CSR management systems. Executives review the status of the management systems on a regular basis.

### **3) Legal and Customer Requirements**

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this code.

### **4) Risk Assessment and Risk Management**

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with FIH's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

**5) Improvement Objectives**

Written performance objectives, targets and implementation plans to improve FIH's social, health and safety, and environmental performance, including a periodic assessment of FIH's performance in achieving those objectives.

**6) Training**

Programs for training managers and workers to implement policies, procedures and improvement objectives. Core curriculums such as orientation training and CSR CoC training should be arranged for new employees, and employees in service should take at least two hours of CoC training per year.

**7) Communication**

Processes for communicating clear and accurate information about FIH's policy, performance, practices and expectations to workers, suppliers and customers.

**8) Worker Feedback, Participation and Grievance**

Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

**9) Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social, health and safety, and environmental responsibility.

**10) Corrective Action Processes**

A process for timely correction of deficiencies identified by internal and external assessments, inspections, investigations and reviews.

**11) Documentation and Records**

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

**12) Supplier Responsibility**

A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

## **VI. Responsible Sourcing of Minerals**

FIH adheres to international standards and governmental and non-governmental regulations on conflict minerals. FIH does not accept, and does not use, conflict minerals in our operations. FIH requires suppliers to trace the origin of products potentially containing conflict minerals, including gold (Au), tantalum (Ta), tin (Sn), and tungsten (W), and to provide all relevant information regarding the sources of those minerals to our company. In addition, FIH's suppliers are required to fulfill their due diligence on conflict-free minerals pursuant to the relevant international standards and regulations, such as Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

## **VII. Anti-Corruption Policy**

FIH upholds a corporate culture of dignity and integrity. FIH is committed to full compliance with local and international anti-corruption and anti-bribery laws and regulations. Corruption, bribery, embezzlement or improper activities are strictly prohibited. FIH has a zero-tolerance policy towards activities or behaviors that are in violation of the anti-corruption policy. All employees are inducted with at least two hours of compulsory anti-corruption training every year. In addition, all partnerships with suppliers, vendors and customers must strictly comply with the anti-corruption policy.

## **VIII. Anti-Trafficked & Forced Labor**

FIH hereby declares that it does not engage in or accept human trafficking and does not use or support the use of forced labor as stipulated in Forced Labor Convention (No. 29). These include the use of threats, compulsion, coercion, abduction, fraud, or payment of compensation to anyone controlling another person to transport, hide, recruit, transfer, or receive personnel for the purpose of exploitation. The company shall not require employees to pay any deposit or hold original identification documents of employee during employment.

## **IX. Community Engagement**

FIH is committed to help foster social and economic development and to contribute to the sustainability of the communities in which it operates.

## 6. ENFORCEMENT OF THE CoC POLICY

The CoC policy approved by the FIH ESG Committee Chairman will be defined as an ethical commitment that includes basic principles and standards for the appropriate development of relations between FIH and its main stakeholders (employees, customers, shareholders, suppliers, the community, investors, and non-governmental organizations). The spirit and guidance embodied in the standards of business conduct policy must be followed by all our employees, in particular by our managers across our businesses to set an example for others to follow. Business groups must provide annual assurance that the CoC policy is being adhered to within their business operations.

The corporate and business group management also needs to roll out the approved CoC policy to our employees. This should take place in a variety of ways, reflecting the different cultures and sizes of our businesses around the world. Employees' rights, the Code requirements, and expectations documented in this CoC policy should be communicated to all staff through employees' labor contracts, employees' handbooks, and other channels which convey the need for effective and exact implementation of and adherence to this CoC policy.

FIH should also perform auditing and benchmarking, and design programs as validation instruments for ongoing training and awareness of candid execution of the CoC policy. The CSR and Sustainability programs to substantiate CSR and Sustainability policy should employ a comprehensive audit protocol, which is designed to assess performance at FIH's international sites and yield a standardized scorecard system to establish a baseline for tracking improvements and making comparisons with peer companies. Furthermore, it is considered that any deployed system should provide for complaints and suggestions from our ground operations, and therefore whistle-blowing mechanisms and grievance channels must be established in order to seek improvements. By formally documenting and revising this CoC policy, FIH aims for continuous organizational improvement and innovative governance practices.

FIH is devoted to sustainable development and an all-win outcome for stakeholders with the following public statements and progress benchmarks:

- Commitment to corporate citizenship of sustainable business for all stakeholders.
- Integration of economic bottom line with social and environmental performance to protect corporate reputation and public image.
- Transparency of information and disclosure to interest holders.
- Alignment of communication with industrial partners for best CSR and Sustainability practices, risk management, and media crisis handling.
- Incorporation of CSR and Sustainability principles into FIH's culture and daily business operations.



- To continue FIH ESG Committee as FIH's global CSR strategic driver and tactical mechanism for CSR and Sustainability.
- To produce an annual Environmental, Social and Governance Report complying HKEX's ESG reporting request and deliver FIH's CSR and Sustainability value propositions and achievements.
- To enforce FIH global policy for international establishments across customer groups, business units and suppliers; and
- To conduct periodic self-audit programs and implement self-audit actions, make corrective action plans, and timely feedback to customers about our improvements; and to establish a standard mechanism for better interacting with customers.

**Approved by:**

A handwritten signature in black ink, appearing to be 'W. L. CHOI'.

**FIH Mobile Limited**

**Announcement Date: December 6<sup>th</sup>, 2023**