

# Labor and Human Rights Policy

## 劳工与人权政策

| Current Version 当前版本 | Effective Date 生效日期       |
|----------------------|---------------------------|
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### 1. Purpose 目的

This policy aims to safeguard the legitimate labor rights of employees at Beijing Aden Hotel Services Co., Limited, respect and uphold their fundamental human rights, and foster a fair, just, safe, and healthy working environment. By establishing a comprehensive labor and human rights management system, the company ensures compliance with relevant laws, regulations, and international standards, enhances employee satisfaction and sense of belonging, and promotes mutual growth for both the company and its employees.

本政策旨在保障北京埃顿酒店服务有限公司员工的合法劳工权益，尊重和维护员工的基本人权，营造公平、公正、安全、健康的工作环境。通过建立完善的劳工与人权管理体系，确保公司运营符合相关法律法规和国际准则，提升员工的满意度和归属感，促进公司与员工共同发展。

### 2. Application and Scope 范围与场合

This policy applies to all employees of Beijing Aden Hotel Services Co., Limited, covering all departments and positions at all levels of the company. At the same time, subsidiaries and branches of the company are also required to comply with this policy in the course of conducting business.

本政策适用于北京埃顿酒店服务有限公司全体员工涵盖公司所有部门及各层级岗位。同时，公司的子公司、分公司在开展业务过程中也需遵守本政策。

### 3. Reference Documents 参考文件

Universal Declaration of Human Rights 《世界人权宣言》

Core Labor Standard by International Labor Organization 国际劳工组织《核心劳工标准》

Labor Law of the People's Republic of China 《中华人民共和国劳动法》

Labor Contract Law of the People's Republic of China 《中华人民共和国合同法》

Work Safety Law of the People's Republic of China 《中华人民共和国安全生产法》

Measures for the Management of Occupational Health Examinations 《职业健康检查管理办法》

Law of the People's Republic of China on Prevention and Control of Occupational Diseases 《中华人民共和国职业病防治法》

## 4. Responsibilities 职责

Management: Approve this policy and related systems, provide necessary resources for implementation, lead by example in compliance, supervise departmental execution, and review reports regularly to make informed decisions.

管理层：审批本政策及相关制度，为政策实施提供必要的资源支持。带头遵守政策规定，监督各部门的执行情况，定期听取工作汇报并做出决策。

Human Resources Department: As the main responsible department for the implementation of this policy, it is responsible for formulating, revising, interpreting and promoting the policy. It organizes and conducts training related to labor and human rights, supervises the implementation of the policy by various departments, and handles employee complaints and related issues. At the same time, the department establishes an employee feedback mechanism to collect employees' opinions and suggestions on policy implementation.

人力资源部门：作为本政策实施的主要负责部门，负责政策的制定、修订、解释和推广。组织开展劳工与人权相关培训，监督各部门对政策的执行情况，处理员工申诉和相关问题。同时，建立员工反馈机制，收集员工对政策执行的意见和建议。

All Functional Departments: Strictly abide by the provisions of this policy and implement specific requirements regarding employee health and safety, working conditions, etc. The head of each department is the first person responsible for labor and human rights work within the department, promptly identifies and resolves problems within the department, and cooperates with the human resources department to carry out relevant work.

各职能部门：严格遵守本政策的各项规定，落实员工健康安全、工作条件等方面的具体要求。部门负责人为本部门劳工与人权工作的第一责任人，及时发现和解决本部门存在的问题，配合人力资源部门开展相关工作。

Safety Management Department: Responsible for formulating and implementing employee health and safety management systems, conducting safety inspections and hazard investigations, organizing safety training and emergency drills, and ensuring workplace safety.

安全管理部门：负责制定和实施员工健康安全管理制度，开展安全检查和隐患排查，组织安全培训和应急演练，确保工作场所的安全。

## 5. Review and Update 审查与更新

Review Cycle: This policy should be reviewed at least once a year, led by the Human Resources Department and with the cooperation of all relevant departments. In the event of major adjustments to national laws and regulations, changes in the industry environment, or strategic adjustments of the company, review should be conducted in a timely manner.

审查周期：本政策至少每年审查一次，由人力资源部门牵头，各相关部门配合完成。如遇国家法律法规重大调整、行业环境变化或公司战略调整等情况，应及时进行审查。

Review Content: Assess the applicability, effectiveness and compliance of the policy, check the completion of quantified targets, collect feedback from employees, departments and other relevant parties, and analyze existing problems and deficiencies.

审查内容：评估政策的适用性、有效性和合规性，检查量化目标的完成情况，收集员工、部门及其他相关方的反馈意见，分析存在的问题和不足。

Update Mechanism: Based on the review results, if policy revision is required, the Human Resources Department will organize the revision, seek the opinions of all relevant departments, and then report to management for approval. After approval, the updated policy will be promptly released to all employees and training will be organized to ensure that employees are informed of the policy changes.

更新机制：根据审查结果，如需对政策进行修订，由人力资源部门组织修订，征求各相关部门意见后报管理层审批。审批通过后，及时向全体员工发布更新后的政策，并组织培训，确保员工了解政策变化。

Record Retention: The process and results of policy review and update are documented in writing, including review reports, revision explanations, approval documents, etc., which are archived by the Human Resources Department for a retention period of no less than five years.

记录保存：政策审查和更新的过程及结果形成书面记录，包括审查报告、修订说明、审批文件等，由人力资源部门存档保存，保存期限不少于 5 年。

## 6. Definition 定义

Labor Rights: Refers to the rights that employees are entitled to in accordance with laws, regulations and labor contracts, including reasonable remuneration, rest and leave, labor protection, vocational training, social insurance, etc.

劳工权益：指员工依据法律法规和劳动合同所享有的各项权利，包括获得合理报酬、休息休假、劳动保护、职业培训、社会保险等。

Human Rights: Refer to the basic rights possessed by people, which in this policy mainly involve the right to life, the right to health, the right to personal dignity, the right to equality, and the right to association.

人权：指人所享有的基本权利，在本政策中主要涉及员工的生命权、健康权、人格尊严权、平等权、结社权等。

Discrimination: Unfair treatment of an employee in recruitment, employment, promotion, remuneration, etc. on any grounds such as race, color, gender, religion, political opinion, national origin or social background.

歧视：指基于种族、肤色、性别、宗教、政治见解、民族血统或社会出身等任何理由，对员工在招聘、录用、晋升、薪酬等方面采取的不公平对待。

Harassment: Refers to the act of insulting, threatening, offending, or infringing upon another person's dignity by means of words or actions, including but not limited to sexual harassment, workplace bullying, etc.

骚扰：指以语言、行为等方式对他人进行侮辱、恐吓、冒犯等，侵犯他人人格尊严的行为，包括但不限于性骚扰、职场霸凌等。

Forced Labor: Refers to the act of forcing an employee to perform labor against their will by means of violence, threats, deception, etc.

强迫劳动：指违反员工意愿，通过暴力、威胁、欺骗等手段强制员工提供劳动的行为。

## 7. Content 内容

### Employee Health and Safety 员工健康安全

1. The company is committed to providing employees with a safe and healthy working environment, equipped with necessary safety protection facilities and Personal Protective Equipment

(PPE), conducting regular health checks and safety training to ensure the health and safety of employees during work.

公司承诺为员工提供安全、健康的工作环境，配备必要的安全防护设施和劳动保护用品，定期开展健康检查和安全培训，确保员工在工作过程中的健康和安全得到保障。

2. Establish and improve safety management systems and operating procedures, clarify the safety responsibilities of each position, provide safety training to employees, and ensure that they possess the necessary safety knowledge and operational skills.

建立健全安全管理制度和操作规程，明确各岗位的安全职责，对员工进行安全培训，确保员工具备必要的安全知识和操作技能。

3. Regularly conduct safety inspections and hazard investigations in the workplace, promptly rectify risks found, and prevent safety accidents.

定期对工作场所进行安全检查和隐患排查，及时整改发现的问题，防止安全事故发生。

4. Provide employees with PPE that meet national standards and supervise them to use them correctly.

为员工提供符合国家标准的劳动保护用品，并监督员工正确使用。

5. Organize occupational health examinations for employees as required, establish health records for employees, and provide timely treatment and proper placement for employees with occupational diseases.

按照规定组织员工进行职业健康检查，建立员工健康档案，对患有职业病的员工及时给予治疗和妥善安置。

6. Formulate emergency response plans and conduct regular drills to ensure that incidents can be dealt with promptly and effectively, reducing casualties and property losses.

制定应急预案，定期开展应急演练，确保在发生安全事故时能够及时有效处置，减少人员伤亡和财产损失。

## Working Conditions 工作条件

1. In line with the principles of fairness and reasonableness, and guaranteeing employees' basic living and rest rights, provide employees with good working conditions and benefits, and ensure that employees can balance work and life.

遵循公平合理、保障员工基本生活和休息权利的原则，为员工提供良好的工作条件和福利待遇，确保员工能够平衡工作与生活。

2. The company is committed to strictly adhering to national regulations on working hours, rest and leave, and welfare benefits, continuously improving working conditions for employees, gradually increasing employee welfare benefits in accordance with the company's development, and guaranteeing employees' right to rest.

公司承诺严格遵守国家关于工作时间、休息休假和福利待遇的规定，不断改善员工工作条件，根据公司发展情况逐步提高员工福利待遇，保障员工的休息权利。

3. The company pays social insurance (endowment insurance, medical insurance, unemployment insurance, work-related injury insurance, maternity insurance) for its employees, and provides housing fund, annual bonus, festival benefits, birthday benefits, physical examination benefits, etc. based on the company's performance.

为员工缴纳社会保险（养老保险、医疗保险、失业保险、工伤保险、生育保险），根据公司效益提供住房公积金、年终奖、节日福利、生日福利、体检福利等。

4. Employees are entitled to national statutory holidays, annual leave, marriage leave, maternity leave, bereavement leave, etc. Wages and benefits during the holidays are implemented in accordance with national regulations and company systems.

员工享有国家规定的法定节假日、年休假、婚假、产假、丧假等假期，假期期间的工资待遇按照国家规定和公司制度执行。

5. Strictly follow the national regulations on working hours, with no more than 8 hours per day and no more than 44 hours per week on average. If overtime is required for work, it should be negotiated with the employee, and the overtime hours should comply with the national regulations and overtime pay should be paid as stipulated.

严格执行国家关于工作时间的规定，每日工作时间不超过 8 小时，平均每周工作时间不超过 44 小时。因工作需要安排加班的，应与员工协商，且加班时间符合国家规定，并按照规定支付加班费。

## Promotion and Training 晋升与培训

1. Adhere to the principles of fairness, impartiality and transparency, provide equal promotion opportunities and training resources for employees, and make promotion and training arrangements based on employees' abilities, performance and potential to promote their career development.

坚持公平、公正、公开的原则，为员工提供平等的晋升机会和培训资源，根据员工的能力、业绩和潜力进行晋升和培训安排，促进员工的职业发展。

2. The company is committed to establishing a scientific promotion mechanism and training system, formulating personalized career development plans for employees, providing necessary training support, helping employees improve professional skills and overall quality, and achieving the common growth of individuals and the company.

公司承诺建立科学的晋升机制和培训体系，为员工制定个性化的职业发展规划，提供必要的培训支持，帮助员工提升专业技能和综合素质，实现个人与公司的共同成长。

3. Establish clear promotion standards and processes, make the promotion process open and transparent, and ensure that all eligible employees have equal promotion opportunities.

建立明确的晋升标准和流程，晋升过程公开透明，确保符合条件的员工都有平等的晋升机会。

4. Regularly evaluate employees' performance and use the results as a key basis for promotion and training.

定期对员工进行绩效评估，将评估结果作为晋升、培训的重要依据。

5. Provide employees with a variety of training courses, including onboarding training, job skills training, career development training, etc., to meet the development needs of employees at different stages.

为员工提供多样化的培训课程，包括入职培训、岗位技能培训、职业发展培训等，满足员工不同阶段的发展需求。

6. Encourage employees to participate in external training and learning, and provide them with the necessary learning resources and support.

鼓励员工参加外部培训和学习，为员工提供必要的学习资源和支持。

## Unions and Free Association 工会与自由结社

1. Respect employees' right to free association, recognize the legitimacy of unions as employee representatives, establish good communication and cooperation with unions, and resolve labor issues through consultation.

尊重员工的自由结社权，承认工会作为员工代表的合法性，与工会建立良好的沟通与合作关系，通过协商解决劳资问题。

2. The company is committed to respecting and safeguarding employees' right to free association, not interfering with employees' right to organize and join unions in accordance with the law, actively engaging in consultation and dialogue with unions, and safeguarding employees' legitimate rights and interests.

公司承诺尊重和保障员工的自由结社权，不干涉员工依法组织和参加工会的权利，积极与工会进行协商和对话，维护员工的合法权益。

3. Employees have the right to organize and join trade unions in accordance with the law, and trade unions have the right to represent employees in collective bargaining with the company and to reflect the opinions and demands of employees.

员工有权依法组织和参加工会，工会有权代表员工与公司进行集体协商，反映员工的意见和诉求。

4. The company provides the necessary conditions and support for the trade union to carry out activities and establishes a regular communication mechanism with the trade union to negotiate on issues such as labor remuneration, working conditions and welfare benefits.

公司为工会开展活动提供必要的条件和支持，与工会建立定期沟通机制，就劳动报酬、工作条件、福利待遇等问题进行协商。

5. Respect the independence and autonomy of the trade union and do not take any measures to impede the normal operation of the trade union.

尊重工会的独立性和自主权，不采取任何措施阻碍工会正常工作。

## **Prohibit the Employment of Child Labor and Forced Labor 禁止雇佣童工与强迫劳动**

1. Strictly abide by national laws and regulations prohibiting the employment of child labor and forced labor, and resolutely eliminate any form of employment of child labor and forced labor.

严格遵守国家关于禁止雇佣童工和强迫劳动的法律法规，坚决杜绝任何形式的童工雇佣和强迫劳动行为。

2. The company undertakes not to recruit any minors under the age of 16, not to use forced labor, to ensure that employees provide labor on a voluntary basis, and to respect the personal freedom and will of employees.

公司承诺不招聘任何未满 16 周岁的未成年人，不使用强迫劳动，确保员工在自愿的基础上提供劳动，尊重员工的人身自由和意愿。

3. During the recruitment process, strictly verify the age certificates of the applicants to ensure that they are at least 16 years old.

在招聘过程中，严格核查应聘者的年龄证明，确保应聘者年满 16 周岁。

4. It is prohibited to force employees to work in any form, including violence, threats, deception, wage arrears, etc.

禁止以任何形式强迫员工劳动，包括暴力、威胁、欺骗、拖欠工资等手段。

5. Employees have the right to decide for themselves whether to provide labor, and companies must not restrict employees' personal freedom.

员工有权自主决定是否提供劳动，公司不得限制员工的人身自由。

## **Non-Discrimination and Anti-Harassment 禁止歧视与骚扰**

1. Adhere to the principles of equality, respect and inclusion, prohibit any form of discrimination and harassment, and create a harmonious and friendly working atmosphere.

坚持平等、尊重、包容的原则，禁止任何形式的歧视和骚扰行为，营造和谐、友善的工作氛围。

2. The company promises to treat employees equally in recruitment, employment, promotion, salary, training and other aspects, and will not discriminate against employees on the basis of race, color, gender, religion, age, marital status and other factors. It firmly opposes and stops any form of harassment.

公司承诺在招聘、录用、晋升、薪酬、培训等方面给予员工平等对待，不因种族、肤色、性别、宗教、年龄、婚姻状况等因素歧视员工，坚决反对和制止任何形式的骚扰行为。

3. Establish anti-discrimination and anti-harassment systems, clearly define prohibited behaviors and handling measures, and provide relevant training to employees to raise their awareness and consciousness.

制定反歧视和反骚扰制度，明确禁止的行为和处理措施，对员工进行相关培训，提高员工的认识和意识。

4. Establish a complaint mechanism to handle employees' complaints about discrimination and harassment in a timely manner, deal seriously with verified acts, and protect the rights and interests of victims.

建立投诉机制，及时处理员工关于歧视和骚扰的投诉，对查实的行为进行严肃处理，保护受害者的权益。

5. Create a corporate culture that respects diversity and inclusiveness and encourages employees to respect and understand each other and work together to maintain a good working environment.

营造尊重多样性和包容性的企业文化，鼓励员工相互尊重、相互理解，共同维护良好的工作环境。

## Quantitative Targets 量化目标

### Quantitative Targets for Employee Health and Safety 员工健康安全量化目标

Ongoing Targets: 2024-2028

持续目标：2024 年-2028 年

Target 1: 100% availability of safety protection facilities to ensure that safety protection equipment in all workplaces is functioning properly.

目标 1：安全防护设施完好率达到 100%，确保所有工作场所的安全防护设备都能正常发挥作用。

Target 2: 100% coverage of occupational health examinations for employees in positions exposed to occupational hazard factors as required by the Measures for the Administration of Occupational Health Examinations.

目标 2：对于《职业健康检查管理办法》要求的接触职业病危害因素的岗位的员工，职业健康检查覆盖率达到 100%。

### Quantitative Targets for Working Conditions 工作条件量化目标

Base Year: 2024

基准年：2024 年

Holiday Target: By 2028, the actual rate of paid annual leave for employees will reach 95%.

假期目标：到 2028 年，员工带薪年假实际休假率达到 95%。

### Quantitative Targets for Promotion and Training 晋升与培训量化目标

Base Year: 2024

基准年：2024 年

Promotion Target: Increase the proportion of internal promotions among managers to 70% by 2028.

晋升目标：到 2028 年，管理人员内部晋升占比提升至 70%。

Training Target: Ensure that the annual completion rate of new employee onboarding training reaches 100% for office staff and 85% for project site staff.

培训目标：确保每年新员工入职培训完成率达到办公室员工 100%，项目点员工 85%。

### **Quantitative Targets for Trade Unions and Freedom of Associations 工会与自由结社量化目标**

Ongoing Target: 2024 -2028

持续目标：2024 年-2028 年

Target 1: Ensure 100% coverage of collective agreements.

目标 1：确保集体协议覆盖率为 100%。

### **Quantitative targets for Prohibiting Child Labor and Forced Labor 禁止雇佣童工与强迫劳动量化目标**

Ongoing Targets: 2024-2028

持续目标：2024 年-2028 年

Target 1: Achieve 100% accuracy in verifying the age of entry of employees and eliminate any form of child labor employment.

目标 1：员工入职年龄核查准确率达到 100%，杜绝任何形式的童工雇佣。

Target 2: Zero employee complaints about forced labor, ensuring that employees provide labor on a voluntary basis.

目标 2：关于强迫劳动的员工投诉为零，确保员工在自愿的前提下提供劳动。

## Quantitative Targets for Prohibiting Discrimination and Harassment 禁止歧视与骚扰量化目标

Ongoing Target s: 2024-2028

持续目标：2024 年-2028 年

Target 1: Anti-discrimination and harassment training 100% employee awareness, making every employee clearly aware of the relevant regulations.

目标 1：反歧视与骚扰培训员工知晓率达到 100%，让每一位员工都清楚了解相关规定。

Target 2: Ensure zero incidents of discrimination and harassment occur each year.

目标 2：确保每年歧视骚扰事件零发生。

## 8. Complaints and Reports 申诉与报告

### Complaint Channels 申诉渠道

(1) Telephone 电话申诉：021 - 5465 7968-717

(2) Email 邮箱申诉：HQ.ethics@adenservices.com

(3) Written appeal: Mail to the Human Resources Department. Address: 218 Xiangyang Nan Lu, Xuhui District, Shanghai. Recipient: Appeal Handling Specialist of Human Resources Department.

书面申诉：邮寄至公司人力资源部门，地址：上海市徐汇区襄阳南路 218 号现代大厦 埃顿集团全球总部，收件人：人力资源部门申诉处理专员。

(4) In-person appeal: Go to the human resources department of the company and submit the appeal in person to the appeal handler.

当面申诉：前往公司人力资源部门，向申诉处理专员当面提交申诉。

### Processing Procedures 处理流程

After receiving the complaint, the human resources department should conduct an initial verification within 3 working days and decide whether to accept it.

人力资源部门在收到申诉后，应在 3 个工作日内进行初步核实，决定是否受理。

For accepted complaints, an investigation should be completed within 15 working days, which may be extended to 30 working days if the situation is complex, and the progress should be promptly informed to the complainant.

对受理的申诉，应在 15 个工作日内完成调查，情况复杂的可延长至 30 个工作日，并及时向申诉人告知进展情况。

After the investigation is completed, a decision will be made based on the investigation results and the results will be informed to the complainant in writing within 5 working days. If the complainant has any objection to the handling result, he may apply for a review to the superior management within 5 working days after receiving the result. The management shall complete the review and make a final decision within 10 working days.

调查结束后，根据调查结果作出处理决定，并在 5 个工作日内将处理结果书面告知申诉人。申诉人对处理结果有异议的，可在收到结果后 5 个工作日内向上一级管理层申请复核，管理层应在 10 个工作日内完成复核并作出最终决定。

## **Reporting Mechanism 报告机制**

The Human Resources Department summarizes and analyzes the handling of complaints on a quarterly basis and forms a report to submit to management. The report includes the number and types of complaints, the results of handling, existing problems and improvement measures, etc.

人力资源部门每季度对申诉处理情况进行汇总分析，形成报告提交管理层。报告内容包括申诉数量、类型、处理结果、存在的问题及改进措施等。

## **Protective Measures 保护措施**

The company keeps the information of the whistleblower strictly confidential and does not disclose the identity of the whistleblower. Any act of retaliation against whistleblowers, once verified, will be dealt with seriously.

公司对举报人的信息严格保密，严禁泄露举报人身份。对打击报复举报人的行为，一经查实，将严肃处理。