

Grandblue Environment Co., Ltd.

Employee Rights Statement

I. Purpose

Grandblue Environment Co., Ltd. (the “Company”) is committed to fostering a respectful, inclusive, and safe workplace where all employees thrive. The Company believes that such an environment is essential for enabling individuals to reach their full potential and for supporting the shared growth of both employees and the Company.

We strictly comply with all applicable labor and human rights laws and regulations, including, but not limited to the *Labor Law*, *Civil Code*, *Personal Information Protection Law* of the People's Republic of China, as well as relevant laws and regulations in countries or regions where the Company operates.

II. Scope of Application

This statement applies to all regular employees across all departments within the Group, including wholly owned and majority-owned subsidiaries.

III. Core Principles

The Company upholds a strict “zero tolerance” policy against any form of discrimination, harassment, or human rights violations. We are committed to:

- Equal Opportunity: Ensuring fairness and non-discrimination in all aspects of employment, including recruitment, compensation, training, promotion, and termination decisions.
- Respect for Diversity: Embracing diversity and creating an inclusive and equitable work environment.
- People-Centered Approach: Respecting the right to freedom of association, upholding collective bargaining rights, and prohibiting all forms of forced labor.
- Health and Safety: Providing a safe and healthy working environment, and supporting both the physical and mental well-being of employees.
- Continuous Improvement: Advancing employee rights through ongoing training, due diligence processes, and regular policy evaluations.

IV. Policy Details

(1) Equal Employment

The Company strictly complies with relevant labor laws and regulations of the countries and regions in which it operates. Our recruitment processes are merit-based and transparent, with publicly disclosed job qualifications, and fair, standardized interview procedures. We oppose all forms of discrimination, including those based on race or ethnicity, place of birth or social origin, social class or ancestry, religion or belief, physical or mental disability, genetic information, gender or gender identity, sexual orientation, age, trade union membership, political opinion, or other legally protected characteristics. We strictly prohibit any invasive or discriminatory practices such as mandatory pregnancy or virginity tests under any circumstances.

(2) Prohibition of Child Labor and Forced Labor

The Company does not employ child labor. "Child Labor" is defined as: individuals under 16 years of age; anyone below the legal minimum working age in their respective country/region; and anyone who has not completed compulsory education. Juvenile workers (under 18) are not assigned tasks that could endanger their health or safety.

All employment must be voluntary. The Company unequivocally opposes the use of violence, coercion, threats, or any restriction of personal freedom in employment. We do not require employees to provide security deposits, withhold identity documents, or engage in or facilitate any form of forced labor.

(3) Prohibition of Harassment

The Company maintains a zero tolerance stance on all forms of harassment, including, but not limited to:

Sexual Harassment: Includes, but is not limited to unwelcome sexual advances, requests for sexual favors, sexually suggestive remarks or jokes, suggestive gestures, display or dissemination of sexually suggestive images or messages, and any unwanted physical contact (such as touching, embracing, or assault).

Non-Sexual Harassment (including abuses of authority): Includes conduct based on any protected characteristic listed in Section IV(1) of this policy (Equal Employment) that creates a hostile or coercive work environment, including, but not limited to insults, defamation, malicious prejudice, abuse, violence, threats, or intimidation.

Retaliation: Retaliation against individuals who report harassment or

discrimination in good faith, or who participate in investigations, is strictly prohibited.

(4) Protection of Employee and Human Rights

The Company strictly complies with relevant laws and regulations in China and overseas, upholding the human rights of all employees regardless of gender, nationality, religion, race, or ethnicity.

The Company supports employees' legal rights to lawfully form or join trade unions and engage in collective bargaining. We ensure employees can raise concerns and communicate openly with management without fear of reprisal.

(5) Employee Well-being and Support

The Company actively fosters a positive and harmonious workplace culture through:

Work-life Balance: Providing cultural and recreational facilities, organizing diverse activities, promoting work-life balance, and enhancing employees' sense of identity, belonging, and happiness.

Mental Health Support: Offering EAP (Employee Assistance Program) services, including access to professional counseling to support employee emotional and psychological well-being.

Support for Female Employees: The Company offers paid leave for maternity-related needs, including prenatal checkups, maternity leave, and nursing leave. Pregnant employees beyond seven months are entitled to one hour of rest per workday. Workstations with appropriate seating are provided for those in standing roles.

Family Care Support: The Company provides special leave entitlements, including: 10 days annually for employees who are only children to care for their parents; 10 days of parenting leave annually for employees with children under the age of three years; 15 days of paternity leave for eligible male employees.

V. Implementation and Safeguards

(1) Training and Education

The Company provides regular training to ensure all employees understand this policy, their rights and responsibilities, and the roles of management in identifying, preventing, responding to, and investigating violations.

(2) Reporting and Complaint Mechanisms

The Company encourages all employees, suppliers, and other stakeholders to report suspected violations through the following confidential and retaliation-free channels:

- Direct Supervisor (when appropriate and safe)
- Human Resources Department

We are fully committed to confidentiality and assure that reports will only be disclosed as necessary for investigation. Retaliation against reporters is strictly forbidden and will result in disciplinary action.

(3) Investigation and Resolution Procedures

- Timely and Impartial Investigations: All complaints will be handled promptly, impartially, and thoroughly investigated.
- Due Process: The investigation process ensures fairness to all parties, both complainants and respondents will have equal opportunities to present evidence and statements.
- Communication and Outcomes: Conclusions from investigations will be based on facts. Investigation results and decisions will be communicated, subjected to legal and privacy considerations.

(4) Disciplinary and Corrective Actions

If a violation of this policy is substantiated, the Company will promptly impose corrective and disciplinary measures commensurate with the severity of the incident.