

西安炬光科技股份有限公司

FocusLight Technologies Inc.

FLCO-LOS-WI-0082

企业社会责任手册

Social Responsibility Manual

Rev. B0

西安炬光科技股份有限公司

Focuslight Technologies Inc.

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版本控制

Revision History

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1 目的 Objective

1.1 建立本手册，用于确保公司在员工权益保障、商业道德、环境保护、职业健康与安全方面 能够持续满足法律以及客户要求，并持续改善以在这些方面多尽企业的社会责任。

1.1 This manual is established to ensure that the Company can continuously meet the legal and customer requirements in terms of employee rights protection, business ethics, environmental protection, occupational health and safety, and continuous improvement in these areas to undertake more corporate social responsibility.

1.2 建立本手册，作为实施本企业的社会责任体系的依据，并与现有的环境、健康与安全管理 体系形成企业的劳动权益保障体系、商业道德体系、环境管理体系、职业健康与安全体系。

1.2 This manual is established as the basis for the implementation of the Company's social responsibility system, and forms the enterprise's labor rights and interests protection system, business ethics system, environmental management system and occupational health and safety system with the existing environment, health and safety management system.

1.3 本手册参照 SA8000, ISO 14001, OHSAS 18001, EICC 等国际标准的要求建立。手册经过公司管理委员会核准批准后生效实施。

1.3 This manual is established according to the requirements of SA8000, ISO 14001, OHSAS 18001, EICC and other international standards. The manual shall come into effect after being approved by the Management Board of the

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Company.

2 适用范围 Scope

本手册适用于西安炬光科技股份有限公司及其各子公司，包括炬光（东莞）微光学有限公司、炬光（海宁）光电有限公司、炬光香港投资管理有限公司、Focuslight USA LLC.、LIMO GmbH、LIMO Display GmbH、Focuslight Europe Ltd, 炬光（韶关）光电有限公司, 炬光（合肥）光电有限公司, Focuslight Switzerland SA, Heptagon Photonics Pte. Ltd.（曾用名：Focuslight Singapore Pte. Ltd.）以及 Heptagon Photonics Malaysia SDN. BHD.（以下简称“炬光科技”或“公司”）。

This Manual are applicable to Focuslight Technologies Inc. and its subsidiaries, including Focuslight (DG) Micro-optics Co., Ltd., Focuslight (Hai Ning) Optoelectronics Co., Ltd, Focuslight (Hong Kong) Investment Management Co., Ltd, Focuslight USA LLC.、LIMO GmbH、LIMO Display GmbH、Focuslight Europe Ltd, Focuslight (Shaoguan) Optoelectronics Co., Ltd., Focuslight (Hefei) Optoelectronics Co., Ltd., Focuslight Switzerland SA, Heptagon Photonics Pte. Ltd.(formerly: Focuslight Singapore Pte. Ltd.) and Heptagon Photonics Malaysia SDN. BHD. (hereinafter refer to “**Focuslight**” or “**the Company**”).

公司各级人员及其他有关人员，都必须严格遵守、切实执行本手册。

All personnel at all levels of the company and other relevant personnel must strictly observe and earnestly implement this Manual.

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3 社会责任方针 **Social Responsibility Policy**

3.1 劳动与人权：公司以人为本，尊重员工的权益，不歧视员工、不进行强迫劳动、不体罚与虐待员工、尊重法律允许下的自由结社、不使用童工、工作时间、工资福利符合法规要求，并进行持续改善，以不断的符合法规的要求。

3.1 Labor and Human rights: the Company is people-oriented, respects the rights and interests of employees, does not discriminate against employees, does not carry out forced labor, does not corporal punishment and abuse employees, respects the freedom of association under the law, does not use child labor, working hours, wages and benefits meet the requirements of laws and regulations, and makes continuous improvement to continuously meet the requirements of laws and regulations.

3.2 商业道德：符合法律法规要求，参与公益事业，反对不正当利益与不正当的商业竞争。

3.2 Business ethics: comply with the requirements of laws and regulations, participate in public welfare undertakings, and oppose unfair interests and unfair business competition.

3.3 环境：预防环境污染，符合法律法规要求，产品中不使用受限物质，持续改善。

3.3 Environment: prevention of environmental pollution, compliance with laws and regulations, no use of restricted substances in products, continuous improvement.

3.4 健康与安全：把安全放在首位，预防安全生产事故发生，符合法律法规要

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求，持续改善。

3.4 Health and safety: put safety in the first place, prevent production safety accidents, meet the requirements of laws and regulations, and continuously improve.

4 劳工与人权 Labor and Human Right

4.1 禁止使用童工。遵守所有适用的劳工法。本公司拒绝一切形式的童工。公司严格禁止雇佣未满 18 周岁的人员。若因疏忽导致雇佣童工，公司将立即采取纠正措施，包括停止工作、向主管劳动部门报告、安排健康检查并通知其监护人，确保安全返回家庭。

4.1 No child labor. Complying with all applicable labor laws, the Company rejects all forms of child labor. The Company strictly prohibits the employment of individuals under the age of 18. In the event that underage labor is inadvertently employed, immediate corrective actions shall be taken, including stopping work, reporting to labor authorities, arranging health checks, and notifying parents or legal guardians to ensure safe return.

4.2 未成年保护。对符合法律规定的未成年工，公司仅安排适合的轻度工作，并严格遵守工时、健康与安全保护的相关法律法规。

4.2 Juvenile Workers Protection. For legally permitted juvenile workers, the Company will only assign appropriate light work and strictly comply with laws and regulations on working hours, health, and safety protection.

4.3 禁止强迫性劳动。公司不得雇佣或支持任何形式的非自愿劳动，包括强迫劳动、债役劳动、契约劳动、监狱劳动等。所有雇佣关系均应基于员工自由意志。

4.3 No Forced labor. The Company shall not employ or support any form of

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involuntary labor, including forced, debt-bonded, indentured, or prison labor. All employment relationships shall be based on employees' free will.

4.4 不歧视。公司反对任何形式的员工歧视行为，每位员工都应该公平对待，确保：

4.4 No discrimination. The Company opposes any form of employee discrimination, and each employee should be treated fairly to ensure that:

1) 在涉及聘用、报酬、培训机会、升迁、解职或退休等事项上，公司不得从事或支持基于种族、社会等级、国籍、宗教、身体残疾、性别、性取向、工会会员、政治归属或年龄之上的歧视；

1) In terms of employment, remuneration, training opportunities, promotion, dismissal or retirement, the Company shall not engage in or support discrimination based on race, social class, nationality, religion, physical disability, gender, sexual orientation, trade union membership, political affiliation or age;

2) 公司不能干涉员工行使遵奉信仰和风俗的权利，和满足涉及种族、社会阶层、国籍、宗教、残疾、性别、性取向、工会会员和政治从属需要的权利；

2) The Company shall not interfere with the right of employees to abide by their beliefs and customs, and the right to meet the needs of race, social class, nationality, religion, disability, gender, sexual orientation, trade union membership and political subordination;

3) 公司不能允许强迫性、虐待性或剥削性的性侵扰行为，包括姿势、语言和身体的接触。

3) The Company cannot allow forced, abusive or exploitative sexual harassment, including posture, language and physical contact.

4.5 结社自由与免于报复。公司尊重员工依法享有的自由结社与退出权利。员工不得因加入、退出或参与工会及合法组织活动而受到歧视或报复。

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4.5 Freedom of Association and Protection from Retaliation. The Company respects employees' lawful rights to freely associate or withdraw from associations. No employee shall face discrimination or retaliation for joining, leaving, or participating in union or lawful organizational activities.

4.6 人性化管理。公司尊重每一位员工，公司不得从事或支持体罚、精神或肉体胁迫以及言语侮辱，也不得对女职工进行性骚扰。

4.6 Humanized Management. The Company respects every employee. The Company shall not engage in or support corporal punishment, mental or physical coercion, verbal insult, or sexual harassment of female employees.

4.7 工作时间。公司遵守适用法律及行业标准有关工作时间的规定，即正常的周工作时间不超过 40 小时，每周至少应有 1 天休息时间，每周加班时间不超过 12 小时；除非工作需要，不得安排加班工作，任何员工都有权拒绝加班工作，并不得因拒绝加班而收到惩罚或批评。

4.7 Working hours. The Company shall comply with the provisions of applicable laws and industry standards on working hours, that is, the normal working hours shall not exceed 40 hours per week, there shall be at least one day off per week, and the overtime shall not exceed 12 hours per week; No overtime work shall be arranged unless the work needs to be done. Any employee has the right to refuse to work overtime and will not be punished or criticized for refusing to work overtime.

4.8 福利待遇。公司提供符合当地法规的工资、加班工资与福利给员工，为员工提供符合法规的社会保险，并建立员工福利制度并告知员工，工资的支付应满足工人基本的生活需求；公司在发工资时提供工资条给员工，工资条上应列明各项收入与扣减项目；每月 10 日支付员工上月工资、福利待遇以银行转帐方式，以方便员工提取使用；

4.8 Social benefits. The Company provides employees with wages, overtime

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wages and benefits in accordance with local laws and regulations, provides employees with social insurance in accordance with laws and regulations, establishes employee welfare system and informs employees that the payment of wages should meet the basic living needs of workers; The Company shall provide the pay-slip to the employees at the time of payment, and the pay-slip shall list the income and deduction items; On the 10th of each month, the salary and social benefit of the employee last month shall be paid by bank transfer to facilitate the withdrawal and use of the employees;

4.9 员工告知。本手册第 4 部分的内容应通过适当方式告知员工，并定期对管理人员进行培训。

4.9 Staff notification. The Contents of Part 4 of this manual shall be communicated to employees in an appropriate way, and management personnel shall be trained regularly.

5 商业道德 Ethics

5.1 廉洁经营。所有商业的互动关系中都应遵循最高的诚信标准。参与者应禁止任何及所有形式的贪污、敲诈勒索和挪用公款等行为，应推行监控和强化程序以确保符合廉洁经营的要求。

5.1 Clean operation. All business interactions should follow the highest standards of integrity. Participants should prohibit any and all forms of corruption, extortion and misappropriation of public funds, and implement monitoring and strengthening procedures to ensure compliance with the requirements of clean operation.

5.2 无不正当利益。公司每位员工不得提供或接受贿赂或其他形式的不正当收益，并制定相关标准定期对相关人员进行培训。

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5.2 No unjust interests. Every employee of the Company shall not offer or accept bribes or other forms of improper income, and shall formulate relevant standards and conduct regular training for relevant personnel.

5.3 业务记录。诚实、准确地并且完全遵照适用法律法规的要求填写、记录、报告、保留及处理业务信息和记录。

5.3 Business records. Complete, record, report, retain and process business information and records honestly, accurately and in full compliance with applicable laws and regulations.

5.4 内线交易。不得在拥有关于本公司不为投资大众所知且可能影响投资者买卖股票的决定的非公开信息时通过买卖本公司股票而进行内线交易。

5.4 Insider trading. It is not allowed to conduct insider trading by buying and selling the Company's shares when it has non-public information about the Company that is not known to the investing public and may affect the decision of investors to buy and sell shares.

5.5 保护知识产权。公司尊重知识产权，建立《知识产权管理程序》，以确保公司以及客户的技术和生产经验的转让能有效保护。

5.5 Protection of intellectual property right. The Company respects intellectual property rights and establishes "intellectual property management procedures" to ensure that the transfer of technology and production experience of the company and customers can be effectively protected.

6 健康与安全 Health and Safety

6.1 健康与安全方针。公司把员工的健康与安全放在首位，坚持预防为主的原则，按照所适用法律法规的要求，持续不断地改善、提高和完善作业场所的工作环境。

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6.1 Health and safety policy. The Company puts the health and safety of employees in the first place, adheres to the principle of prevention first, and continuously improves and perfects the working environment in the workplace according to the requirements of applicable laws and regulations.

7 环境保护 Environmental Protection

7.1 环境保护方针。遵守所有所适用的环保法律法规，以污染预防为主，按照所适用的法律法规的要求，持续不断地改善有害物质的排放。

7.1 7.1 Environmental protection policy. Comply with all applicable environmental laws and regulations, focus on pollution prevention, and continuously improve the emission of hazardous substances in accordance with applicable laws and regulations.

8 管理体系 Management System

8.1 体系策划 System Planning

8.1.1 法律法规以及其它要求。定期获取社会责任相关的法律法规以及其他要求，包括劳动权益、商业道德、环境、健康与安全等方面的法规及客户要求；同时对收集的法律法规进行评价，确认公司的运行是否符合其要求。

8.1.1 Laws, regulations and other requirements. Regularly obtain laws, regulations and other requirements related to social responsibility, including laws and regulations on labor rights, business ethics, environment, health and safety and customer requirements; At the same time, evaluate the collected laws and regulations to confirm whether the company's operation meets its requirements.

8.1.2 风险识别、评价与控制。Risk identification, evaluation and control.

1) 风险识别应包括劳动权益、商业道德、环境、健康与安全等方面的所有因

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素。

1) Risk identification should include all factors of labor rights, business ethics, environment, health and safety.

2) 本手册所提及的风险跟公司现有的环境管理体系中的环境因素、及职业健康与安全管理中的危险源等同；主要风险与环境管理体系中的重大环境因素、及职业健康与安全管理中的重大危险源等同。

2) The risks mentioned in this manual are equivalent to the environmental factors in the company's existing environmental management system and the hazards in the occupational health and safety management system; The main risks are equivalent to the major environmental factors in the environmental management system and the major hazard sources in the occupational health and safety management system.

8.1.3 目标、指标与方案。Objective, target and scheme.

在适当的时候（例如在公司决定改善劳工利益，或是环境保护，或是职业健康与安全保护时）制定目标与指标，并通过改善方案来实现目标与指标。

Set goals and targets when appropriate (for example, when the Company decides to improve labor interests, or environmental protection, or occupational health and safety protection), and achieve them through improvement programs.

8.2 体系实施 System implementation

8.2.1 资源职责与权限 Resource responsibilities and authorities

1) 管理阶层应该提供为确保本体系的建立、实施、维持和改进提供必要的资源，包括人力资源专项技能、组织的基础设施、以及技术和财力资源。

1) The management should provide the necessary resources to ensure the establishment, implementation, maintenance and improvement of the system, including human resource specific skills, organizational infrastructure, and technical and financial resources.

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2) 为便于社会责任工作的有效开展，应对相关人员的作用、职责和权限做出明确规定。

2) In order to facilitate the effective development of social responsibility work, the role, responsibility and authority of relevant personnel should be clearly defined.

8.2.2 能力、培训与意识 Ability, training and awareness

1) 应通过培训、招聘、考核等方式，但不限于这些方式，来确保工人具备该岗位的能力：

1) Training, recruitment, assessment and other methods should be adopted, but not limited to these methods, to ensure that workers have the ability of the post;

2) 公司保证所有员工定期接受健康与安全培训，还应给新进及调职员工重新进行培训，当工作场所、设施或操作流程有改变时应该进行必要健康与安全的培训；公司还应保证所有员工定期接受劳动权益法律知识的培训或宣传。

2) The Company guarantees that all employees receive health and safety training regularly, and shall also retrain the new employees and transferred employees. When the workplace, facilities or operation process change, necessary health and safety training shall be conducted; The company shall also ensure that all employees receive regular training or publicity on legal knowledge of labor rights and interests.

3) 所有培训应该保存记录，并对培训结果进行评价。

3) 3) All training records shall be kept and the training results shall be evaluated.

8.2.3 供应商管理 Suppliers Management

1) 建立供应商管理体系，制定《供应商商业行为准则》、《供应商廉洁承诺书》及《商业伙伴贸易安全承诺书》等体系文件；

1) 1) Establish supplier management system, and formulate system documents such as supplier code of business conduct, supplier integrity commitment and trade security commitment of business partners;

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2) 保留供应商签署的相关《供应商商业行为准则》、《供应商廉洁承诺书》及《商业伙伴贸易安全承诺书》，确保公司的供应商遵守本手册的规定，廉洁地开展业务。

2) Keep the relevant code of business conduct for suppliers, letter of commitment on integrity of suppliers and letter of commitment on trade safety of business partners signed by suppliers to ensure that the suppliers of the company comply with the provisions of this manual and conduct business incorruptly.

3) 避免利益冲突。避免不当行为或利益冲突。供应商及其代表不应与持有供应商重大经济利益的任何本公司员工直接打交道或与其协商任何供应商协议。在协商任何供应商协议或履行供应商义务过程中，也不得与供应商受雇于本公司的配偶、其他家属或亲戚直接打交道。

3) Avoid conflicts of interest. Avoid misconduct or conflict of interest. The supplier and its representatives shall not directly deal with or negotiate any supplier agreement with any employee of the company who has a significant economic interest in the supplier. In the process of negotiating any supplier agreement or performing the supplier's obligations, the supplier shall not directly deal with the spouse, other family members or relatives of the supplier employed by the company.

8.2.4 文件与文件控制。Documents Control

公司应该保留适当的文件与记录，以证明公司符合本标准中的各项规定，并制定《文件控制程序》来规定文件的发行、保存与作废等相关要求。

The Company shall keep proper documents and records to prove the company's compliance with the provisions of this standard, and formulate the document control procedure to specify the relevant requirements for the issuance, preservation and cancellation of documents.

8.2.5 运行控制。建立运行控制流程以确保本手册的有效实施。

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8.2.5 Operation control. Establish operation control process to ensure the effective implementation of this manual.

8.2.6 内部审核、管理评价。公司内审部对本手册的实施进行不定期的审核，并出具审核报告，对不符合项进行评价，并监督纠正。

8.2.6 Internal audit and management evaluation. The internal audit department of the company conducts irregular audit on the implementation of this manual, issues audit report, evaluates the non conformance items, and supervises the correction.

9 附则 Appendix

本手册经公司管理委员审阅批准后生效，由公司治理部负责解释并根据公司情形的变化进行不时地相应修订。

This Manual shall come into force after being reviewed and approved by the Management Board of the Company, and shall be interpreted by the corporate governance department and amended accordingly from time to time according to the changes of the Company's situation.