E-Commodities Holdings Limited
Occupational Health and Safety (OHS) policy

(In case of any discrepancy between the English and Chinese versions, the Chinese version shall prevail)

I. Purpose of Establishment

The Company has always regarded OHS as the cornerstone of its sustainable development. Upholding the philosophy of “safety first, prevention-oriented, people-centric, and combining prevention with treatment,” we build and continuously improve our production safety management system and standardization framework. We effectively manage occupational health and safety risks associated with our production and operations, and have established a comprehensive occupational health and safety safeguard system—coordinated by the Group level and implemented by its subsidiaries. Through this, we continuously enhance our occupational health and safety performance management, safeguarding the health and well-being of our employees, contractors, and the communities where we operate.

II. Scope of Application

This Commitment applies to all employees of E-Commodities Holding Limited and all of its subsidiaries (collectively “E-Commodities” or “the Company”). The Company shall, to the greatest extent practicable, advocate for and promote compliance with the principles set forth in this policy among its joint ventures, other affiliated entities, suppliers and other business partners. Any breach of this policy may jeopardize the relevant party's business relationship with E-Commodities, and may even result in termination of cooperation between the two parties.

III. Principles

E-Commodities strictly complies with the health and safety laws, regulations, and administrative provisions of the countries and regions where it operates, including but not limited to the *Work Safety Law of the People's Republic of China*, the *Law of the People's Republic of China on the Prevention and Control of Occupational Diseases*, the *Pneumoconiosis Prevention and Control Regulations of the People's Republic of China*, the *Provisions on the Supervision and Administration of Occupational Health at Workplaces*, the *Management Standard of Labor Protection Articles for Employers*, and the *Measures for the Supervision and Administration of Occupational Health Surveillance by Employers*. In the event that the national or local laws of the operating location conflict with or impose stricter requirements than this policy, the national and local laws of the operating location shall prevail.

IV. Specific Measures and Requirements

1. OHS Management System

1.1. Establish and Improve Occupational Health Rules and Regulations

1.1.1. Each subsidiary shall implement national laws, regulations, rules, and standards regarding the prevention and control of occupational hazards, strengthen the management of occupational hazard prevention, elevate the level of occupational hazard control, and effectively safeguard the health and safety of workers during their labor process. In accordance with the relevant provisions of *the Law on the Prevention and Control of Occupational Diseases* and *the Interim Provisions on the Supervision and Administration of Occupational Health at Workplaces*, and in light of actual on-site management conditions, each subsidiary shall formulate tailor-made OHS management systems.

1.1.2. The management system shall specify the basic content and procedures of occupational health management and occupational disease management, and clearly delineate the responsibilities and authority of relevant departments and positions in this regard.

1.1.3. The principle that “those in charge of production must be in charge of safety" shall be implemented at both the organizational and institutional levels. The responsibilities of leaders at all levels, functional departments, production departments, and employees within each subsidiary regarding occupational hazard prevention and control shall be explicitly defined, ensuring that responsibilities are assigned at every level, each party fulfills its duty, and occupational hazard prevention work is properly executed to guarantee the sustainable development of production.

1.2. Comprehensively Strengthen Occupational Hazard Protection Management

1.2.1. When undertaking new construction, renovation, or expansion projects, the Company shall prioritize the adoption of new technologies, processes, and materials that are conducive to the prevention of occupational diseases and the protection of employee health, gradually replacing technologies, processes, and materials that pose severe occupational disease hazards.

1.2.2. New construction, renovation, and expansion projects must undergo an occupational disease hazard pre-assessment in accordance with the requirements of *the Law of the People's Republic of China on the Prevention and Control of Occupational Diseases*. The evaluation of occupational disease hazards must be conducted by an institution that has obtained qualifications for occupational health technical services.

1.2.3. When constructing new, renovated, or expanded production engineering facilities, occupational health and safety facilities must strictly comply with the "Three Simultaneities" system—meaning they must be designed, constructed, and put into use or operation simultaneously with the main facility.

1.2.4. Production and operation sites shall provide employees with a working environment and conditions that meet national occupational health standards and requirements, equipped with relevant facilities such as forced ventilation and dust removal devices. Furthermore, these facilities must be maintained, overhauled, and periodically tested for performance and effectiveness to ensure they remain in normal operating condition. No unit or individual may reappropriate, dismantle, or cease using them without authorization.

1.2.5. Occupational health facilities must be set up in accordance with regulations, equipped with emergency protective tools, first-aid kits, and other occupational health appliances. Regular inspections must be conducted, and relevant records retained.

1.2.6. Production and operation sites must feature clearly marked emergency evacuation routes. The department responsible for managing the production site shall keep these routes clean and unobstructed; arbitrary occupation or blockage of these routes is strictly prohibited.

1.2.7. Personal protective equipment (PPE) and tools shall be distributed to workers on a regular basis in accordance with national or industry standards, based on the types and intensity of occupational hazard factors present at specific job positions. The proper wearing and use of PPE shall be supervised and guided, and any failure to use or improper use of labor protection equipment shall be corrected promptly.

1.2.8. Suppliers of special labor protection equipment must possess legal and valid qualifications, and the special labor protection equipment supplied must obtain the corresponding certification marks. Procurement of special labor protection equipment from unqualified suppliers is strictly prohibited. The procurement department shall verify the supplier's legal qualifications, and cooperation may only proceed after the risk control department approves supplier admission.

1.2.9. Communal protective equipment (such as respirators, protective boots, and specialized protective clothing) maintained by the production departments and warehouses of each subsidiary must be stored in designated, safe, and easily accessible locations. Relevant workers must be informed, designated management personnel assigned, regular calibrations and maintenance performed, inspection records retained, and the management status of protective equipment routinely checked and supervised.

1.3. Strictly Execute Occupational Hazard Factors Monitoring and Disclosure

1.3.1. Each subsidiary shall truthfully inform employees of potential occupational disease hazards, their consequences, protective measures, and associated benefits during the work process, without concealment or deception.

1.3.2. When an employee's job position or work content changes during the term of an existing employment contract, resulting in assignment to work involving occupational disease hazards that were not disclosed in the original employment contract, the HR and EHS (Environmental, Health, and Safety) departments of the subsidiary shall truthfully inform the employee of the occupational disease hazard factors associated with the new job position and work content.

1.3.3. Subsidiaries shall periodically commission qualified occupational health service institutions to test and evaluate occupational hazard factors existing within the company, and retain the test and evaluation results.

1.3.4. Subsidiaries shall establish occupational health bulletin boards to publish rules and regulations, operating procedures, emergency rescue measures for occupational disease hazard accidents, and test results of workplace occupational disease hazard factors. Bulletin boards shall be managed by designated personnel and updated regularly.

1.3.5. Production sites generating occupational disease hazards shall display occupational disease hazard notification cards in prominent locations. Warning notices shall state the types, consequences, prevention, emergency medical treatment measures, and test results of occupational disease hazard factors, informing workers of relevant information.

1.4. Fully Implement Employee Health Surveillance

1.4.1. Subsidiaries shall organize pre-employment, on-the-job, and off-boarding occupational health examinations for employees engaged in operations involving occupational hazards, and truthfully inform employees of their examination results.

1.4.2. Personnel who have not undergone a pre-employment occupational health examination shall not be assigned to operations involving occupational hazards, and employees with occupational contraindications shall not be assigned to prohibited tasks.

1.4.3. The Company shall not assign underage workers to operations involving occupational hazards, nor assign pregnant or lactating female employees to operations hazardous to themselves, their fetuses, or their infants.

1.4.4. Workers found during health examinations to have occupational contraindications or work-related health damage shall be reassigned from their original positions and properly placed; those discovered to have health damage or requiring re-examination shall be truthfully informed.

1.4.5. If an employee is suspected of having an occupational disease, it shall be reported to functional government departments in accordance with relevant regulations and procedures. The Company shall oversee the diagnosis and identification of employee occupational diseases, and coordinate the treatment, rehabilitation, periodic checks, and social security management for diagnosed employees.

1.4.6. Each subsidiary shall strictly establish and improve employee occupational health surveillance files in accordance with the provisions of *the Law of the People's Republic of China on the Prevention and Control of Occupational Diseases*, properly preserving them for the required retention period without loss, falsification, or unauthorized destruction.

1.5. Continuously Strengthen Occupational Disease Publicity and Education

1.5.1. Each subsidiary shall incorporate occupational disease prevention publicity and education into its annual safety training plan, establishing a multi-tiered and job-specific education and training system to ensure training covers all employees in positions exposed to occupational hazard factors.

1.5.2. Special pre-employment training on occupational disease prevention shall be conducted for new recruits, transferred employees, or those adopting new processes, technologies, or materials. Training content shall include, but is not limited to: occupational disease hazard factors present at the post, potential health damage, methods of using protective facilities, correct wearing of PPE, and emergency rescue measures. Employees may only take up their posts after passing the assessment.

1.5.3. Refresher training on occupational disease prevention knowledge shall be organized regularly for active employees, focusing on strengthening hazard awareness, protective skills, and emergency response capabilities. The training time, content, participants, and assessment results shall be truthfully recorded and archived for future reference.

1.5.4. Full use shall be made of events such as Safety Production Month and Occupational Disease Prevention Law Publicity Week to extensively promote occupational disease prevention—through distributing publicity materials, holding knowledge competitions, conducting emergency drills, and organizing case warning education—thereby enhancing all employees' occupational health awareness and self-protection capabilities.

1.5.5. Each subsidiary shall annually evaluate the effectiveness of occupational disease prevention publicity and education training, continuously improving training content and methods based on evaluation results to ensure relevance and effectiveness.

1.5.6. Each subsidiary shall ensure that management personnel responsible for occupational disease prevention regularly receive training on relevant laws, regulations, and professional knowledge, possessing occupational health management capabilities appropriate to the production and operating activities of the unit.

1.5.7. In accordance with occupational disease prevention requirements, expenses incurred by each subsidiary for preventing and treating occupational disease hazards, workplace health testing, health surveillance, and occupational health training shall be listed as actual production costs in accordance with relevant national regulations.

2. OHS Performance

2.1. OHS Performance Target Setting

2.1.1. Each subsidiary shall formulate annual OHS performance targets based on the Group's annual OHS strategic plan, taking into account its own business characteristics, risk levels, and operational realities, ensuring targets are scientifically sound, reasonable, and feasible.

2.1.2. OHS performance targets shall follow the principles of being "quantifiable, achievable, traceable, and challenging," encompassing outcome indicators (e.g., occupational injury accident rate, major safety hazard rectification rate), process indicators (e.g., hazard inspection completion rate), and management indicators (e.g., frequency of management site safety inspections).

2.1.3. Each subsidiary shall break down its annual OHS performance targets level by level to functional departments, workshops, stations, teams, and key positions, signing safety target responsibility letters to clarify responsible persons, completion deadlines, and safeguard measures at all levels, forming a target responsibility network that "extends horizontally to all borders and vertically to the bottom."

2.1.4. Each subsidiary shall file its annual OHS performance targets annually and incorporate them into the annual performance evaluation system for management personnel at all levels.

2.2 OHS Performance Monitoring and Evaluation

2.2.1. Each subsidiary shall establish a routine OHS performance monitoring mechanism to periodically compile statistics, analyze, and evaluate the completion of safety targets, identifying deviations in a timely manner and taking corrective actions.

2.2.2. Monitoring content shall include, but is not limited to: accident and injury records, occupational disease check results, hazard discovery and rectification status, operation status of protective facilities, training and drill execution, and employee safety behavior observation results.

2.2.3. Each subsidiary shall perform an annual safety summary and analysis. The analysis report shall contain the completion status of OHS performance targets, prominent issues, corrective measures, and work plans for the next phase.

2.3 OHS Performance Assessment, Rewards, and Penalties

2.3.1. Each subsidiary shall establish an internal OHS performance reward and penalty system, linking safety performance with position promotion, compensation adjustment, and award eligibility, creating a management mechanism that combines positive incentives with rigid constraints.

2.3.2. Each subsidiary shall conduct annual performance assessments for management personnel at all levels based on annual OHS performance targets.

2.4 Continuous Improvement and Benchmarking

2.4.1. Each subsidiary shall regularly conduct OHS performance reviews, analyze the underlying causes of accident hazards, summarize and promote excellent safety management experience, and drive the continuous optimization of the safety management system.

2.4.2. Organize employees to participate in safety management through multiple channels. Relying on the construction of the safety standardization system, carry out safety management activities such as “daily position checks, weekly department checks, and monthly company checks,” “Safety Snapshots,” and “Common Hazard List Compilation,” fostering an organizational atmosphere where “everyone cares about safety and participates in improvement.”

2.4.3. Conduct horizontal performance comparisons among E-Commodities' subsidiaries to learn from the management experience and practices of outstanding units; encourage subsidiaries to benchmark OHS performance against industry leaders and similar regional enterprises, identify gaps, introduce advanced management tools and technical methods, and continuously improve OHS performance levels.

2.4.4. Promote exchange and promotion through annual safety work meetings, specialized training, team-building activities, and other channels, facilitating cross-unit experience sharing and collaborative enhancement, driving a safety culture atmosphere of "emulating, learning from, catching up with, and surpassing each other."

2.5 OHS Performance Data Management

2.5.1. Each subsidiary shall establish standardized OHS performance data management rules, specifying responsible persons and management standards for data collection, review, storage, reporting, and disclosure to ensure the authenticity, completeness, accuracy, and traceability of data.

2.5.2. OHS performance data shall be classified and archived, covering accident statistics, hazard ledgers, inspection records, training files, health surveillance results, etc., with retention periods not shorter than the minimum years required by laws and regulations.

2.5.3. Subsidiaries shall establish a periodic briefing mechanism for OHS performance, communicating information on OHS performance targets, hazard ledgers, typical accident case studies, and excellent safety practices to all employees through safety meetings and bulletin boards, ensuring the transparency and timeliness of safety information.

2.5.4. The Group Supervision Department shall regularly conduct spot audits on the OHS performance data of each subsidiary, severely handling untruthful data, concealed reporting, or omitted reporting in accordance with regulations.

2.5.5. Each subsidiary shall organically combine OHS performance management with corporate safety culture construction, enhancing employees' sense of identity and belonging regarding safety work through diversified activities such as selecting outstanding employees, Safety Month activities, and safety micro-video competitions, promoting the internalization of safety concepts in mind and externalization in action.

3. Investigation and Handling Procedures for Occupational Hazard

and Safety Accidents

3.1. General Provisions

3.1.1. To standardize the investigation and handling of production safety accidents, and clarify responsibilities and procedures at all levels, these procedures are formulated in accordance with the *Work Safety Law of the People's Republic of China, the Regulations on the Reporting, Investigation and Handling of Production Safety Accidents (State Council Order No. 493)*, the Measures for Investigation and Handling of Occupational Hazard Accidents, and relevant company regulations.

3.1.2. Accident investigation and handling shall adhere to the principle of “scientific rigor, legal compliance, seeking truth from facts, and emphasizing practical results,” strictly implementing the “Four Don't Let Offs” principle: cause unclarified, don't let off; responsible persons unhandled, don't let off; corrective measures unimplemented, don't let off; and relevant personnel uneducated, don't let off.

3.2. Division of Responsibilities

3.2.1. As the comprehensive safety oversight department, the Group Supervision Department is responsible for organizing internal accident investigations and statistical analysis, convening accident analysis meetings, and evaluating the implementation of corrective measures.

3.2.2. As the responsible entities for accident management within their units, each subsidiary is responsible for accident information submission, internal investigation and analysis, cooperating with government and Group investigations, implementing rectifications and accountability, establishing accident archives, and organizing warning education.

3.2.3. Relevant departments, personnel, or third-party entities, as responsible entities or involved parties in an accident, are responsible for carrying out accident handling and cooperating with relevant investigations, cooperating with the Company and the government in handling investigations, synchronizing accident-related information, implementing rectifications and accountability, and carrying out warning education.

3.3. On-site Emergency Response

3.3.1. Immediate Work Stoppage: Following an accident, immediately cease operations causing the occupational hazard accident, control the accident site, and prevent situation escalation; clear emergency evacuation routes, evacuate workers, and organize hazard alleviation; protect the accident scene, retaining materials, equipment, and tools that caused the occupational hazard accident.

3.3.2. On-site Judgment and First Aid Priority: Promptly organize medical treatment, health examinations, and medical observation for workers who have suffered or may have suffered acute occupational hazards. In the event of severe injury or fatality, the first person responsible at the scene must immediately call 120 emergency services, accurately stating the accident type, location, and overview of injuries.

3.3.3. Activation of Emergency Plan: The site person-in-charge must report to the unit's primary safety officer as soon as possible. The primary safety officer shall announce the activation of the emergency response plan, establish an on-site command center, clarify division of labor, and conduct unified command and dispatch.

3.3.4. Site Protection and Isolation:

（1） Set up a warning zone and prohibit unauthorized personnel from entering. Properly protect original physical traces at the scene, including equipment states, collapse points, bloodstains, and other key physical evidence.

（2） If the accident occurs in a Customs-supervised warehouse area, additional separate isolation and warning controls must be implemented for Customs-supervised goods to prevent contamination or damage.

（3） Except for main management personnel of the unit and investigation/evidence-collection personnel from regulatory authorities such as health, public security, and emergency management, no other personnel are permitted to approach the scene; unauthorized photography or video recording of the scene is strictly prohibited, as is the dissemination of unverified information or scene conditions via the internet or social media.

3.4. Accident Reporting

3.4.1. Reporting Targets: The local county-level health administrative department (primary reporting channel for health matters), as well as relevant departments including emergency management (if it simultaneously constitutes a production safety accident), industry authorities, and trade unions.

3.4.2. Reporting Time Limits: Relevant personnel at the scene shall immediately report to the person-in-charge of their unit; upon receiving the report, the unit person-in-charge shall rapidly take rescue measures and report in accordance with the Regulations on the Reporting, Investigation and Handling of Production Safety Accidents, typically reporting to health and relevant authorities within 1 hour; in urgent situations, site personnel may report directly to the health department.

3.4.3. Reporting Content: Strictly adhering to the requirements of Article 9 of the Measures for Investigation and Handling of Occupational Hazard Accidents, reporting content includes: accident location, time, onset of cases, death toll, probable causes, measures taken, and development trends.

3.4.4. Group Internal Reporting Time Limits and Procedures:

（1） Upon discovering an accident, site personnel must report to the head of the accident department within 5 minutes, including time, location, type, casualties, and preliminary cause.

（2） Upon receiving the report, the department head must report to the subsidiary's Safety Department and General Manager within 10 minutes, including site status, measures taken, and resources requiring coordination.

（3） The primary safety officer of the involved company must report basic accident and personnel details to the Vice President in charge, Supervision Department, HR Department, Legal Department, and Asset Management Department within 30 minutes, including accident overview, health injuries/casualties, and preliminary financial loss.

（4） The HR Department must notify the work injury insurance agency within 24 hours to communicate initial accident information, initiate work injury determination procedures, and notify the families of injured/deceased personnel.

3.4.5. Accident Reporting Discipline:

（1） Accident reporting must strictly follow discipline. External accident announcements shall be released exclusively by a designated spokesperson, and no unit or individual may release false information externally.

（2） Delayed, omitted, false, or concealed reporting of accidents is strictly prohibited. The Company maintains a whistleblower hotline and email to accept reports of concealed/false reporting; verified allegations will result in escalated handling of responsible entities.

3.5. Group Internal Accident Investigation Process

3.5.1. Investigation Categorization:

In accordance with the classification standards in the *Measures for Investigation and Handling of Occupational Hazard Accidents*:

（1） General accidents involving acute occupational diseases in fewer than 10 persons shall be investigated and handled by the accident unit or its parent subsidiary in cooperation with county-level or higher health administrative departments.

（2） Larger and major accidents involving acute occupational diseases in 10 or more persons shall involve the participation of each subsidiary and the Group Supervision Department to cooperate with higher-level investigations.

3.6. Accident Handling and Rectification

3.6.1. In aftermath handling, the accident unit must properly handle the reception, solace, and compensation of employee families, implementing financial compensation in accordance with relevant regulations.

3.6.2. Where property loss is involved, the Asset Management Department must report the claim to the insurance company within 72 hours, initiating property loss claim procedures.

3.6.3. Rectification measures, assessment, and handling must be fully implemented, with liability determined and imposed on responsible units and personnel according to laws and regulations.

3.6.4. The accident unit must prepare accident case materials, hold an accident analysis meeting, and conduct warning education for all staff.

3.6.5. The Group Supervision Department shall organize evaluations of the implementation of rectification and preventive measures, and issue notifications on typical accidents to prevent recurrence.

3.7. Archives Management

3.7.1. Current evaluation results of occupational disease hazards and rectification status must be promptly archived in the unit's occupational health files.

3.7.2. All materials generated during the investigation and handling of occupational hazard and safety accidents (including reports, evidence, approvals, rectification records, aftermath agreements, etc.) shall be archived and preserved by the lead investigation unit under multi-tiered management, ensuring traceability.

3.7.3. Archival retention periods shall comply with relevant national and company regulations.