

GCL Technology Holdings Limited

Employee Rights Protection Policy

Chapter I: General Principles

Article 1 GCL Technology Holdings Limited (hereinafter referred to as " GCL Technology ") strictly adheres to relevant policies in the field of labor relations, is committed to promoting harmonious and stable labor relations, safeguarding the legitimate rights and interests of workers, and calls on suppliers and partners to comply as well. Additionally, GCL Technology actively follows the policies of human rights protection organizations, resolutely opposes all forms of employment discrimination based on gender, age, or other factors, and strives to foster a fair employment environment.

Chapter II: Specific Provisions

Article 2 GCL Technology recognizes the critical importance of employment for both individuals and society. When operational changes affect employee employment or lead to job terminations, the Group will promptly and reasonably notify relevant authorities, worker representatives (if any), and the public, engage in active communication, and minimize negative impacts to the greatest extent.

Article 3 The Group commits to paying employees a living wage higher than the regional minimum wage to ensure a decent standard of living.

Article 4 GCL Technology establishes and actively promotes joint labor-management plans for health and well-being, contributing to social progress in the countries where we operate.

Article 5 The Group guarantees equal pay for equal work, providing employees with equal employment opportunities. We regularly monitor gender-related

compensation indicators to ensure that female employees receive equal remuneration for equal work.

Article 6 The Group prioritizes employee safety and ensures that workplace health and safety measures are not funded by employees through monetary contributions.

Article 7 GCL Technology respects employees' internationally recognized rights to freedom of association and collective bargaining, upholding the fundamental rights outlined by the International Labour Organization (ILO). We safeguard workers' right to negotiate for their own or collective interests, allow duly designated worker representatives to perform their duties, and regularly communicate with worker representatives on issues such as working conditions to ensure employees have accurate and fair access to information about the Group's finances and operations.

Article 8 The Group conducts checks to identify any direct or indirect forms of discrimination within its operations and areas of influence, ensures no practices that foster discrimination, and promptly identifies and addresses any historical discriminatory behaviors.

Article 9 GCL Technology does not participate in, promote, or endorse activities that infringe upon human rights. We ensure that security measures are human rights-respecting and compliant with laws and regulations.

Article 10 The Group maintains communication with local or international professional human rights organizations, continuously learns, and develops and fully implements human rights policies tailored to its context to enhance employees' awareness of human rights protection.

Article 11 GCL Technology respects the monitoring, findings, and recommendations of international/national human rights organizations, continuously raises awareness of the rights of vulnerable groups, and establishes comprehensive, proceduralized, and transparent human rights grievance procedures based on dialogue and reconciliation. In extreme cases, we strengthen due diligence processes to ensure respect for human rights.

Article 12 The Group respects diversity, promotes inclusive development, and fully supports and advances social education and infrastructure development.

Article 13 GCL Technology strictly complies with local laws and regulations regarding working hours, remuneration and benefits, and leave entitlements, dedicated to safeguarding employees' fundamental rights. In line with the universal principles established by the ILO, the Group stipulates that under normal working conditions, daily working hours (excluding overtime) shall be within eight hours, and total weekly working hours shall not exceed forty-eight hours. For production line employees, the Group ensures that each employee can enjoy at least twenty-four consecutive hours of rest within a continuous seven-day work cycle, and guarantees their right to overtime pay and paid annual leave.

Chapter III: Supplementary Provisions

Article 14 This policy is ultimately interpreted by the Sustainability Center of GCL Technology Holdings Limited.