

Xiaomi Supplier Social Responsibility Code of Conduct

1. Labor

1.1. Prohibition of Forced Labor

- 1.1.1 Supplier is prohibited from using forced labor, bonded labor (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving individuals through means such as threats, violence, coercion, abduction, or fraud, to obtain labor or services.
- 1.1.2 Supplier's workers (including full-time workers, interns, part-time workers, and temporary workers) shall not be required to pay employers, their agents, or sub-agents any fees for their recruiting or other fees related to their employment. If such fees are found to have been paid by workers, such fees shall be repaid to the worker.
- 1.1.3 Supplier shall ensure that all work is voluntary. Workers shall have the right to freely enter into and terminate their employment. Workers who provide reasonable notice of termination in accordance with the contract terms shall not be required to pay any compensation.
- 1.1.4 Supplier shall not confine or restrict worker's freedom of movement inside the place of production or company-provided facilities, including the worker's dormitory or common areas (if applicable).
- 1.1.5 Supplier, its agents, and sub-agents shall not withhold, destroy, conceal, or confiscate workers' original personal documents such as identity documents, passports, visas, and work permits.
- 1.1.6 Suppliers shall provide all employees with a written employment agreement that includes a description of the terms and conditions of employment in the employee's native language or another language that the employee can understand. Overseas migrant employees must receive the employment agreement before leaving the country/region of origin and the employment agreement may not be changed or altered after such employees arrive in the receiving country/region, except for changes to comply with local laws and to provide equal or better terms and conditions.

1.2. Child Labor and Juvenile Workers

- 1.2.1. Supplier is prohibited from using child labor in any stage of manufacturing. The term "child" refers to any person under the age of 16 (in China), or under the minimum age for employment in the country where suppliers manufacture for Xiaomi (whichever is the highest). In the event of any child labor being found, Suppliers must assist and take remediation measures.
- 1.2.2. Supplier may employ juveniles who are older than the applicable legal minimum age but are younger than 18 years of age, provided juveniles do not perform

work that might jeopardize their health, safety, or morals, including night shifts and overtime.

- 1.2.3. Supplier shall implement an appropriate mechanism to verify workers' age.
- 1.2.4. Suppliers shall provide appropriate apprenticeship training to juveniles in legal and voluntary workplaces, subject to applicable laws and regulations.
- 1.2.5. Suppliers should keep proper records of underage workers and rigorously vet their education partners to comply with applicable laws and regulations to protect the rights of juveniles. If not required by local law, juveniles should be paid at least the same level of wages as junior employees performing the same or similar work.

1.3. Working hours

- 1.3.1. Working hours are not to exceed the maximum required by local laws, all overtime must be voluntary.
- 1.3.2. Employees should have at least one day off (24 hours) for every seven days of work.

1.4. Wages and Benefits

- 1.4.1. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. All workers shall receive equal pay for equal work and work of equal value.
- 1.4.2. Supplier shall provide workers with a clear and understandable wage payment receipts that contains enough information to be able to account for the accuracy of the compensation received for the work performed.
- 1.4.3. Supplier shall not use wage deductions as a disciplinary measure.
- 1.4.4. Suppliers shall pay workers overtime wages at a rate higher than the regular hourly rate.

1.5. Non-discrimination, Non-harassment and Human Treatment

- 1.5.1. Suppliers shall provide workers with a workplace free of harassment and unlawful discrimination.
- 1.5.2. Supplier must not engage in any harsh and inhumane treatment such as violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bully, public humiliation or verbal abuse of workers; nor is there to be the threat of any such treatment.
- 1.5.3. Supplier must establish and promote an inclusive culture that values diversity, and promote diversity at all levels of the workforce. Supplier shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or gender expression, ethnicity or national origin, physical or mental handicap, pregnancy, religion, political affiliation, labor union membership, protected genetic information or marital status in hiring and employment practices (such as wages, promotions, rewards, and access to training).

- 1.5.4. Suppliers shall actively promote gender equality and women's access to managerial positions, as well as support women's education, training and skills development.
- 1.5.5. Supplier shall not require workers or potential workers to undergo medical tests (including pregnancy, virginity, or hepatitis tests, etc.) or physical exams that may have a discriminatory purpose.
- 1.5.6. Suppliers shall make reasonable convenience for workers' religious activities and physically and mentally challenging situations.

1.6. Freedom of Association and Collective Bargaining

- 1.6.1. Supplier shall respect the right of workers, in conformance with local laws, to associate freely, to bargain collectively, to assemble peacefully, to join labor unions of their own choosing and to seek representation.
- 1.6.2. Workers and/or their representatives shall be able to communicate openly with management about working conditions and management practices and express views and concerns without concern for discrimination, retaliation, threats, or harassment.

1.7. Whistleblower Protection

- 1.7.1. Supplier shall inform workers of their rights to report workplace concerns through Xiaomi's CSR grievance reporting channel (email: mi-esg@xiaomi.com) and ensure that an effective employee grievance mechanism is in place.
- 1.7.2. Supplier shall establish whistleblower protection guidelines and procedures to ensure that whistleblowers are provided with protection that guarantees the confidentiality and anonymity of the report and enables employees to raise any issue without fear of retaliation.

2. Health and Safety

2.1. Occupational Safety Work Conditions

- 2.1.1. Suppliers shall obtain, maintain and keep up to date all necessary health and safety licenses, approvals and registrations, and shall comply with operational, periodic testing and reporting requirements as set out in the licenses.
- 2.1.2. Supplier shall apply the principle of hierarchy of controls to identify, evaluate, and reduce potential health and safety hazards (such as chemical, electrical, and other energy sources, fire, vehicles, and fall hazards) through a prioritized process of hazard elimination, the substitution of process or material, proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing occupational health and safety training.
- 2.1.3. Supplier shall provide workers, free of charge, with appropriate, well-maintained, personal protective equipment and educational materials about risks associated with the abovementioned hazards.
- 2.1.4. Supplier shall take reasonable measures to remove pregnant women/nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers

(including those associated with their work assignments), as well as to include reasonable accommodations for nursing mothers.

- 2.1.5. Suppliers shall establish, implement and maintain an occupational health and safety management systems (OHSMS) in accordance with ISO 45001, obtain and keep up-to-date all necessary OHSMS management licenses, and comply with their requirements.
- 2.1.6. Suppliers shall properly organize the working hours of their workers, including overtime and legal maximum working hours, rest periods, normal working hours, maternity leave, sick leave and leave for family reasons, to avoid occupational accidents caused by physical and mental fatigue and to maintain the health of their employees. This principle also applies to temporary agency work, secondment of workers and the organization of outsourced work.

2.2. Emergency Preparedness

- 2.2.1. Supplier shall not only identify potential emergencies and events, including but not limited to floods, fires, earthquakes, chemical spills, explosions, fatal accidents, mass poisonings, strikes, and other emergencies, but shall also develop and implement emergency plans and response procedures, including emergency reporting, employee notification, evacuation procedures, worker training, and drills, to minimize their impacts.
- 2.2.2. Emergency plans shall include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, emergency contacts, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.
- 2.2.3. Emergency response and evacuation drills shall be conducted at least once a year, or on a frequency in conformance with local laws and requirements (whichever is more stringent).

2.3. Occupational Injury and Illness

- 2.3.1. Supplier shall establish procedures and systems to prevent, manage, track, and report occupational injury and illness including provisions to: encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.
- 2.3.2. Supplier shall provide pre-job, on-the-job, post-job and job transferring medical surveillance for workers, and inform workers of their scope of services, the exposure to potential occupational hazards and consequences of their work, and provide adequate occupational health protective measures.
- 2.3.3. Supplier shall identify, assess, monitor, and control workers' exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks, to protect workers' health and prevent occupational injury.
- 2.3.4. Suppliers shall allow workers to evacuate at their own discretion in the event of a potential emergency and ensure that they are not required to return to the workplace and will not face any retaliation until the situation has been mitigated.

2.4. Industrial Hygiene

- 2.4.1. Supplier shall, according to the hierarchy of controls, identify, evaluate, and control workers' exposure to biological agents such as chemical reagents, biological reagents, and medical pathogens, as well as physical agents such as high temperature and radiation.
- 2.4.2. Supplier shall minimize workers' exposure to such hazards through designing, engineering (e.g, improved production facilities) or administrative control measures (e.g., laws and regulations).

2.5. Manual Labor

- 2.5.1. Suppliers shall identify, assess and control hazards to workers that may result from physical labor, including risks associated with manual handling of materials, repetitive lifting of heavy objects, standing for long time periods, and performing highly repetitive or intense assembly work.

2.6. Machine Safeguarding

- 2.6.1. Supplier shall conduct regular evaluations of its production and other machinery for safety hazards. Suppliers shall provide and properly maintain physical guards, interlocks, and barriers where machinery presents an injury hazard to workers.

2.7. Public health and Living Conditions

- 2.7.1. Supplier shall provide workers with ready access to clean toilet facilities and potable water, and provide sanitary food, storage facilities, and eating utensils when necessary.
- 2.7.2. Suppliers shall ensure that the workers dormitories provided meet suitable conditions, and that the workers dormitories are maintained in a clean and safe condition, equipped with proper emergency exits, hot water showers and bathing facilities, adequate lighting and heating, good ventilation systems, and separate and secure storage space for personal belongings and valuables. Adequate private space should also be provided, and easy access should be ensured to maintain the privacy and convenience of the occupants.
- 2.7.3. Suppliers shall develop action plans for major infectious disease outbreaks, ensure that adequate supplies are available, and take reasonable steps to prepare for, prevent, and respond to the possibility of collective infections among workers.

2.8. Health and Safety Communication

- 2.8.1. Supplier shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language worker can understand for all identified workplace hazards that workers are exposed to (including but not limited to mechanical, electrical, chemical, fire, and physical hazards).
- 2.8.2. Health and safety- related information shall be displayed in the facility. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

3. Environmental Protection

3.1. Environmental Permits and Reporting

- 3.1.1. Supplier shall obtain, maintain and keep current of all required environmental permits, discharge monitoring, approvals, and registrations, and follow their operational and reporting requirements.
- 3.1.2. Suppliers shall carry out the creation of green factories, realize the intensification of land use, harmlessness of raw materials, clean production, resourcefulness of waste and low-carbon energy, be awarded the national green factory, maintain the enterprise green code, and publish the enterprise green development report on a regular basis.

3.2. Hazardous Material

- 3.2.1. Supplier shall identify and take appropriate measures to prevent adverse impacts to human health, physical safety, or the environment from chemicals, wastes, and other materials throughout the manufacturing process, including to ensure their safe handling, movement, storage, use, recycling, or reuse and disposal.
- 3.2.2. Suppliers shall use green materials and reduce the use of hazardous materials.

3.3. Pollution Prevention and Control

- 3.3.1. Supplier shall comply with all applicable laws and regulations pertaining to the control of pollutants (such as solid waste, wastewater, air emission, and noise), including the requirements for the generation, movement, storage, disposal, and discharge of pollutants.
- 3.3.2. Suppliers shall minimize or eliminate the discharge of pollutants and the generation of waste at source or through preventive means (e.g., additional pollution control equipment, improved production, maintenance and facility processes, etc.).
- 3.3.3. Suppliers shall establish, implement and maintain an environmental management system that meets the requirements of ISO 14001 and continuously improve environmental performance.
- 3.3.4. Suppliers are encouraged to carry out eco-design to effectively manage their own resource and energy consumption, pollutant emissions, and use of hazardous materials, and to control the environmental performance, resource and energy consumption, and restricted use of hazardous materials of their upstream suppliers.

3.4. Restricted Substances

- 3.4.1. Supplier shall adhere to all applicable laws, regulations, and Xiaomi's requirements for managing Xiaomi regarding the prohibition or restriction of specific substances in products and manufacturing (including labeling for recycling and disposal). All products manufactured on behalf of, or provided to Xiaomi, shall comply with relevant guidelines.

3.5. Solid Waste Management

- 3.5.1. Supplier shall implement a systematic approach to identify, manage and reduce solid waste, dispose of or recycle it responsibly, and track and record waste data.

3.5.2. Suppliers' products should be easily recyclable and use green packaging.

3.6. Water Resources and Wastewater Management

3.6.1. Supplier shall implement a systematic approach to identify, control, and reduce wastewater generated from its operations.

3.6.2. Supplier shall implement a water management program that documents, characterizes, and monitors water sources, use, and discharge, and conduct routine monitoring of the performance of its wastewater treatment systems. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

3.6.3. Supplier shall implement a systematic approach to prevent contamination of stormwater runoff. Supplier shall prevent illegal discharges and spills from entering storm drains, the public water supply, or public bodies of water.

3.6.4. Supplier are recommended to manage water resources with reference to international water stewardship standard (Alliance for Water Stewardship).

3.7. Air Emissions

3.7.1. Supplier shall characterize, routinely monitor, reduce, responsibly control, and treat the air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone- depleting chemicals, and combustion by- products generated from operations prior to discharge.

3.7.2. Supplier shall conduct routine monitoring of the performance of its air emission control systems.

3.8. Soil Contamination Management

3.8.1. Supplier shall understand the potential soil contamination risks associated with the current and historical activities at the site, and conduct investigation, assessment, monitoring, and remediation accordingly.

3.9. Greenhouse Gas Emissions Management

3.9.1. Supplier shall identify, calculate, manage, reduce, and control greenhouse gas (GHG) emissions from its operations in a responsible manner.

3.9.2. Supplier shall set GHG emission reduction targets and track, document, and publicly report its energy consumption and Scope 1 and Scope 2 GHG emissions against the targets. Suppliers are encouraged to progressively undertake the identification, tracking, recording and reporting of Scope 3 emissions.

3.9.3. Supplier shall take into consideration its production status and potential alternative solutions, to improve energy efficiency and minimize energy consumption and GHG emissions through energy conservation, use of clean energy, reducing the consumption of fossil fuels, water, and natural resources, or other measures.

3.9.4. Suppliers are encouraged to establish, implement and maintain an energy management system that meets the requirements of ISO 50001 to continuously improve energy performance.

3.10. Noise Management

3.10.1. Supplier shall identify, control, monitor, and reduce noise generated by the production facility.

3.11. Resources Utilization

3.11.1. Supplier shall analyze its resource consumption (such as raw materials, energy, and water) throughout different stages of the product lifecycle (including product design, manufacturing, packaging design, transportation, product use, and disposal), to identify resource-saving solutions (e.g., improved production, use of alternative materials, reuse, recycling, etc.). Suppliers' products should use green packaging that can be easily recycled.

3.12. Biodiversity

3.12.1. Suppliers shall comply with laws and regulations related to biodiversity conservation, ensure that their operational activities, as well as their products and related services, do not negatively impact important habitats, and actively participate in natural ecosystem conservation and restoration actions.

3.12.2. Suppliers shall ensure that their site selection and construction activities avoid and do not invade or cause negative impacts on the habitats of endangered and protected species listed on the International Union for Conservation of Nature (IUCN) Red List, and the natural and cultural heritage sites listed in the World Heritage List of the United Nations Educational, Scientific and Cultural Organization (UNESCO).

3.12.3. Suppliers shall identify biodiversity risks in the whole process management of their products and services and take necessary measures (such as avoidance, reduction, restoration, and offsetting) to minimize negative impacts and enhance ecological well-being.

4. Business Ethics

4.1. Business Ethics

4.1.1. Supplier shall maintain good corporate governance and strictly uphold to business ethics and standards.

4.1.2. Comply with social responsibility codes and relevant regulations.

4.1.3. Ensure that its organizational management and operations comply with relevant government and international regulations, guidelines, conventions, and declarations, and strive for continuous improvements.

4.2. Integrity

4.2.1. Supplier shall uphold the highest standards of integrity in all its business interactions. Supplier shall have a zero-tolerance policy, and must not engage in corruption, extortion, embezzlement, or bribery to obtain an illegal or improper advantage. Supplier shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates.

4.2.2. Suppliers shall not promise, offer, authorize, give, or accept bribes or any other form of undue gain. This prohibition includes promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

4.3. Intellectual Property

- 4.3.1. Supplier shall respect intellectual property. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights.
- 4.3.2. Supplier shall observe and prevent any infringement of the intellectual property rights of business partners and third parties, including the prohibition of counterfeit parts.

4.4. Disclosure of Information

- 4.4.1. Supplier shall ensure that all business dealings are transparently performed and accurately reflected on its business books and records.
- 4.4.2. Supplier shall disclose information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

4.5. Fair Business and Competition

- 4.5.1. Supplier shall abide by all applicable laws and regulations relevant to fair business and competition, including the local laws and regulations related to fair business and anti-monopoly in which it operates.

4.6. Information Security and Privacy Protection

- 4.6.1. Supplier shall take appropriate measures to protect the personal information of everyone they do business with (including suppliers, customers, consumers, and employees, etc.).
- 4.6.2. Supplier shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

4.7. Responsible Sourcing of Minerals

- 4.7.1. Supplier shall conduct responsible management of minerals and exercise due diligence in accordance with Xiaomi Corporation Conflict Minerals Policy, to assure that the tin, tungsten, tantalum, gold (3TG), cobalt, mica, etc. and the derivatives of these metals in the products it manufactures do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuse in the Democratic Republic of the Congo or an adjoining country.

4.8. Animal Welfare

- 4.8.1. Supplier shall follow the national and international rules regarding animal protection and animal testing in any cases, such as the German Animal Protection Law (TierSchG) or the EU Directive 2010/63.
- 4.8.2. Supplier shall process animal products and implement standards and best-practice methods to ensure animal welfare throughout the entire supply chain. Suppliers should prefer alternative methods that do not involve animal testing, except where required by law.

5. Management Systems

5.1. Company Commitment

- 5.1.1. Supplier shall develop and announce a corporate social and environmental responsibility policy statement affirming its commitment to legal and regulatory compliance, customer requirements, and conforming to the requirements of this Code of Conduct.

5.2. Management Accountability and Responsibility

- 5.2.1. Supplier shall identify company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management shall review the effectiveness of the management system on a regular basis and take appropriate actions for continuous improvement.

5.3. Supplier Management

- 5.3.1. New supplier shall sign the Xiaomi Corporation Supplier Social Responsibility Code of Conduct, or agreements with similar requirements. Supplier must confirm the compliance of itself and its own suppliers to Xiaomi's human rights standard and policy and ensures that its workers are treated with respect.

5.4. Legal and Customer Requirements

- 5.4.1. Supplier shall identify and monitor applicable laws, regulations, and customer requirements, including the requirements of this Code of Conduct.

5.5. Risk Assessment and Risk Management

- 5.5.1. Supplier shall identify, assess, and control environmental, health, safety, labor, quality, and business ethics risks associated with its operations. Supplier shall determine the relative significance of each risk, and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
- 5.5.2. Supplier shall conduct risk assessment on a regular basis. The risk assessment shall include the self- assessment result of supplier performance, the risk category of facility location, the supplier's business relationship with Xiaomi, and historical assessment results. Expectations of concerned stakeholders shall also be taken into consideration in the risk assessment.

5.6. Improvement Objectives

- 5.6.1. Supplier shall establish performance objectives, targets, and implementation plans in writer format to improve its social and environmental performance, including a periodic assessment of its performance in achieving those objectives.

5.7. Audits, Assessments, and Corrective Actions

- 5.7.1. Supplier shall perform periodic evaluations of its facilities and operations, as well as the facilities and operations of its subcontractors and sub- tier suppliers that provide goods or services to Xiaomi, to ensure compliance with this Code of Conduct, legal and regulatory requirements, and other requirements related to social and environmental responsibility.

- 5.7.2. Supplier shall have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.
- 5.7.3. Supplier shall permit Xiaomi, or a third party designated by Xiaomi to conduct periodic due diligence and audits, to inspect and verify its compliance with the applicable requirements.

5.8. Documentation and Records

- 5.8.1. Supplier shall create and maintain documents and records to ensure regulatory compliance and conformity to Xiaomi's requirements along with appropriate requirements to protect privacy.

5.9. Upstream Supplier Management

- 5.9.1. Supplier shall establish a supply chain CSR management system. This includes integrating the requirements of this Code of Conduct into the supplier's procurement process, requiring its upstream suppliers to sign on the CSR commitment, and conducting regular audits to ensure the regulatory compliance and continual improvement of its upstream suppliers. Any behaviour of upstream suppliers that violates this Code may affect the continuity of the supplier's business with Xiaomi.
- 5.9.2. Suppliers shall develop sustainable supply chain management system construction, and implement the concept of sustainable low-carbon development throughout the whole process of product design, raw material procurement, production, transport, storage, sales, use and waste treatment, etc., and prioritise the first-tier upstream suppliers (Tier 1) to increase the participation of upstream suppliers in terms of scope and degree year by year, so as to drive the upstream and downstream factories in the supply chain to implement sustainable manufacturing.
- 5.9.3. Suppliers shall establish a process to communicate the requirements of this Code to their suppliers and to monitor supplier compliance to the Code.

6. Communication and Exchange

6.1. Employee Communication

- 6.1.1. Supplier shall provide training to its workers, and help them understand and support the company in implementing its corporate social responsibility.
- 6.1.2. Supplier shall establish internal communication channels. Workers can report any concerns involving discrimination or harassment of the company through the grievance reporting channels in verbal communication or written format. Feedback must be provided to workers regarding resolutions of the reported grievance, ensuring the process's confidentiality and anonymity.
- 6.1.3. Supplier shall develop and maintain management and worker training programs to facilitate proper implementation of its policies and procedures, and to fulfill supplier's continuous improvement objectives.

6.2. Customer and Supplier Communication

- 6.2.1. Supplier shall establish a communication process with external stakeholders to clearly and accurately convey supplier policies, practices, expectations and performance to employees, suppliers and customers, and to exchange corporate social responsibility with customers and suppliers to learn from each other and foster mutual growth.
- 6.2.2. Xiaomi takes responsibility for the sustainable supply chain management. We host annual ESG conferences and provide relevant training programs to help our suppliers stay up to date with international trends and expectations on social and environmental responsibility. Leveraging the strength of Xiaomi's supply chain, we engage and collaborate closely with suppliers to drive continuous improvement on various labor rights issues.
- 6.2.3. Supplier shall promptly notify Xiaomi if it becomes aware that it is unable to operate in conformance to this Code of Conduct during the contract period. Supplier shall provide all necessary information, including details of corrective actions to be taken to ensure conformance with this Code of Conduct.