

AN INTRODUCTION TO HUAWEI:

This statement is prepared for Huawei Technologies (UK) Co., Ltd. (hereinafter referred to as “HWUK” and Company No. is 04295981) and Huawei Technologies Research & Development (UK) Limited (hereinafter referred to as “UKRD” and Company No. is 07371283), both registered in United Kingdom (hereinafter referred to as “UK”), and both are subsidiaries of Huawei Technologies Co., Ltd, a multinational technology corporation headquartered in China (hereinafter together referred to as “we”, “our” or “Huawei”).

This is the Huawei Modern Slavery and Human Trafficking Statement for the fiscal year ended 31 December 2023 and is prepared in accordance with the reporting requirements of the UK Modern Slavery Act 2015 (hereinafter referred to as “MSA”).

WHO WE ARE AND WHAT WE DO

Ubiquitous Connectivity

Every person has the right to be connected. Connectivity is the foundation for social progress and economic growth. Connections will soon become a natural and ubiquitous resource, provided by networks that proactively sense changes and user needs. These networks will offer intelligent, seamless, and secure connections to people and things whenever and wherever they want. With the advent of 5G, we begin a new chapter in this story.

Pervasive Intelligence

In the digital economy, computing power is a new driver of productivity. Data itself is a core asset, and cloud and AI are the new tools of productivity. Moving forward, AI computing will account for more than 80% of a computing center's capacity, providing the muscle for practical AI applications in all areas of life. To deliver ubiquitous cloud and intelligence, we will need to provide diversified computing power.



Personalized Experience

Using AI, cloud, and big data technologies, enterprises can better understand their customers' needs and innovate with greater agility to craft a more personalized experience. Coordination and collaboration across industries will drive innovation at scale. With the continuous evolution of smart devices, a seamless experience across all scenarios will become the foundation of an intelligent life.

Digital Platform

A new digital wave is sweeping the globe. Digital and AI technologies are helping all governments and enterprises become more agile, efficient, and dynamic. Open, secure, flexible, and easy-to-use digital platforms are facilitating innovation and transformation in all industries. They will be the bedrock and the fertile ground for our digital society to flourish.

Founded in 1987, Huawei is a leading global provider of information and communications technology (ICT) infrastructure and smart devices. We have approximately 207,000 employees, of which over one-half were in Research & Development (“R&D”), with R&D spend in 2023 equivalent to 23.4% of Huawei annual revenue. We operate in over 170

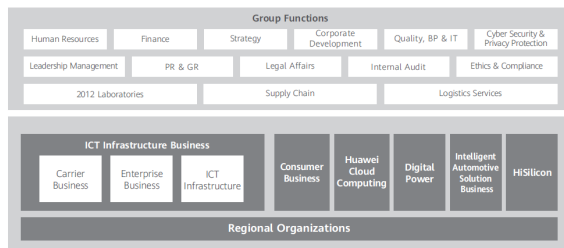
countries and regions, serving more than three billion people around the world. We are committed to bringing digital to every person, home and organisation for a fully connected, intelligent world, with 2023 global revenues of US\$99.4 billion.

Huawei is also a major investor in the UK, supporting thousands of jobs directly and across its UK supply chain.

STRUCTURE OF THE ORGANISATION:

The corporate business structure is shown as follows:

Business Structure



Although not all entities in the Huawei group are subject to the requirements of the MSA, Huawei adopts a company-wide approach to its policies and procedures on modern slavery and human trafficking. Therefore, this report covers activities and steps that are taken at the group level relevant to the Huawei supply chain and internal operations.

Huawei has implemented a mature governance structure, with clearly defined authorization and accountability mechanisms. The governance structure comprises the Board of Directors (BOD), its committees, group functions, and multi-level management teams. Huawei clearly defines the roles and responsibilities of its organisations to ensure the effective separation of authority and responsibilities as well as checks and balances through mutual oversight. The CFO of Huawei is overall accountable for internal controls. The internal control management department reports to

the CFO for any possible defects and improvements already made in terms of internal controls, and assists the CFO in building the internal control environment. The internal audit department independently monitors and assesses the status of internal controls for all business operations.

THE HUAWEI RISK MANAGEMENT SYSTEM:

Huawei uses an Enterprise Risk Management (ERM) system that accounts for our unique organisational structure and operating model, in line with the Committee of Sponsoring Organisations of the Treadway Commission (COSO) framework and referencing the ISO 31000 risk management standard.

Under this system, we have defined a robust set of ERM policies and processes, continually refined our ERM organisations and operating mechanisms, and ramped up efforts to improve risk management and response.

The Huawei ERM system ensures the following:

- The Board of Directors approves company plans for managing major risks and crises and handles unexpected major incidents.
- Business managers, as the primary risk owners in their respective business domains, proactively identify and manage risks to ensure they remain at an acceptable level.

At Huawei, risk management is incorporated into both strategic planning and business planning processes. During strategic planning, we systematically identify and manage strategic risks. During business

planning, we balance risk and cost to formulate appropriate countermeasures and monitor and report on risks as part of performance management during routine operations. Huawei ensures uninterrupted business operations by identifying major risk factors during strategic decision-making and business planning, and taking necessary measures to control risks during operations and execution.

THE HUAWEI POSITION ON MODERN SLAVERY:

Huawei is committed to assessing the specific risks associated with various indicators of forced labour and to ensuring there is no modern slavery, human trafficking or child labour within our supply chains or in any part of our own business operations.

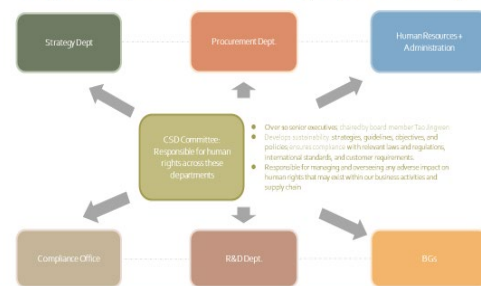
The Huawei Caring for Employees Policy and our Sustainable Development Policy both continue to reflect our commitment to acting ethically and with integrity in all of our business relationships and in implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere throughout the business. Specific sections of both these policies cover such areas as the strict prohibition of child labour, forced or involuntary labour, humane treatment, working hours, respecting diversity, and compensation and benefits.

Huawei does not engage in any type of forced or involuntary labour (such as forced, bonded, or indentured labour or involuntary prison

labour). An employment relationship will only be established on a voluntary basis. Employees have the right to terminate the employment agreement with Huawei with due observance of a proper term of notice stipulated in local laws and regulations as well as corporate policies. We prohibit requesting job applicants to pledge any certificates or to pay deposits for the purposes of obtaining a job at Huawei.

Similarly, we do not force employees to work by resorting to violence, threats, or illegal restriction of personal freedom. We do not direct or mandate employees to perform work that jeopardizes their personal safety; neither do we insult, physically abuse, beat, illegally search, or detain employees. Huawei is opposed to the recruitment, transfer, harbouring or holding of persons, by means of the use of threat, force, other forms of coercion, or deception for the purpose of exploitation. We follow the relevant rules of the “Universal Declaration of Human Rights” (1948).

Strengthening organization structure to manage key areas of human rights



Should there ever be any instances where child labour is unknowingly employed, we shall provide these children with sufficient financial and other support to help them receive an appropriate education until they exceed the age of a child.

In addition, we respect our employees and value their self-esteem. We do not resort to violence nor inhumane means in the treatment of employees, and we do not interfere with the rights of minority ethnic groups to practice their religion and customs and instead provide them with venues and opportunities to do so.

The Huawei Caring for Employees Policy also addresses working hours, with a fair and competitive compensation and benefits system. Quite apart from adherence to applicable laws and industry standards for working hours and public holidays, the policy ensures that Huawei employees can decide for themselves whether they agree to work overtime when the need arises.

Huawei is a signatory to the United Nations Global Compact (UNGC), which is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, environment and anti-corruption. Since joining the UNGC in 2004, our dedication to the highest international standards has been recognised by customers and external organisations, such as China's IPE and the United Nations Global Compact China Network.

Huawei recognises the risks of modern slavery due to the complexity of global supply chains within the ICT industry and has taken management steps to ensure such practices do not take place in our business nor within the businesses of our suppliers of goods and services.

IDENTIFYING MODERN SLAVERY RISKS

Our global management systems support the company-wide promotion of our corporate culture and corporate policies, and the effective management of our business and our business risks. Ultimately, Huawei aims to:

- Stay customer-centric, build an ecosystem for shared success, and continue creating more value for our customers by meeting their needs and pursuing technological innovation
- Effectively manage risks, and ensure operational compliance and business continuity
- Guarantee the trustworthiness of both processes and results
- Pursue Corporate Social Responsibility (CSR) initiatives and promote sustainable development.

Specifically, we have developed strategies to assess and address modern slavery and related risks, in line with our associated policies.



On the Huawei Songshan Lake campus

Our risk assessment has indicated that our operations and supply chain, not unlike those of other ICT companies consisting of our customers, competitors and suppliers, require improved monitoring due to the following:

Industry risks: being in the ICT industry brings possible exposure to Minerals from Conflict-Affected and High-Risk Areas in the mineral supply chain; the complexity of the global supply chain and the changes in business operations means there may be risks of forced labour in our sub-tier suppliers;

Product risks: different types of products may have different levels of risks, and electronic devices manufacturing may have risk of exposure to forced, bonded or indentured labour, child labour and/or overtime; there may be risks of forced labour non-compliance in our Tier-1 or lower-tier suppliers due to the complexity of the supply chain;

Geographic risks: modern slavery risks within suppliers in some countries (especially in developing countries) are higher due to economic, political and cultural differences. In order to assess geographic risks, we conduct country risk mapping via the following internationally-recognised indices for us to focus on those higher-risk countries and priority issues:

- World Bank Worldwide Governance Indicators
- ITUC Global Rights Index
- Yale Environmental Performance Index
- Corruption Perception Index

We also conduct annual supplier risk ranking based on country risk, industry risk, business volume and CSR audit records to identify those high-risk suppliers to be audited via on-site audits.

PREVENTING MODERN SLAVERY - THE HUAWEI STRATEGY:

INTERNAL CONTROL AND EXTERNAL COMPLIANCE:

Huawei continued to improve its internal control system through 2023, based on our organisational structure and operating model. The internal control framework and its management system apply to all business operations and financial processes of Huawei. The internal control system is based on the five components of the COSO framework: Control Environment, Risk Assessment, Control Activities, Information & Communication, and Monitoring. It also covers internal controls of financial statements to ensure their truthfulness, integrity, and accuracy.

We have also worked hard over the years to build a compliance management system that aligns with industry best practices, including COSO's Enterprise Risk Management (ERM) Framework, the US Department of Justice Evaluation of Corporate Compliance Programs, IDW German Institute of Auditors Compliance Management Audit Standards, User Guide, and the corporate management system of Governance, Risk & Compliance, and with ISO 37301:2021 Compliance Management Systems Requirements. At the local and the group level, we have embedded compliance management into every link of our business activities and processes. These

efforts have continued with quarterly reviews through 2023.

BUSINESS ETHICS:

Huawei works hard to conduct its business with integrity and conform to business ethics standards and all applicable laws and regulations. This key principle is upheld by our highest levels of management. We have worked for many years to build a compliance management system that aligns with industry best practices and embed compliance management into every aspect of our business activities and processes, and these efforts continue to this day.

Huawei emphasizes a culture of integrity and invests heavily to make it a reality. As such, every Huawei employee is required to strictly adhere to our Business Conduct Guidelines.

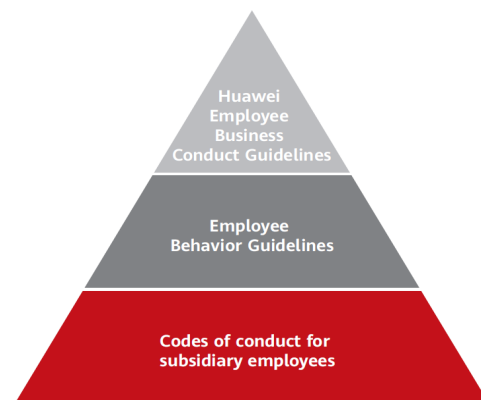
The Huawei Employee Business Conduct Guidelines (BCGs) set out the legal and ethical requirements that every Huawei employee should follow when conducting business activities. This means that in addition to abiding by all applicable laws and regulations in the respective country of operation, employees are also expected to have a strong sense of social responsibility and fulfil our corporate social responsibility by committing to the detailed BCGs every year.

These Business Conduct Guidelines (BCGs) must be observed by all employees, including senior executives and management.

Regular training programs are provided, and all employees are requested annually to sign the BCGs to ensure that the BCGs have been read, understood, and observed.

As reflected in our policies, Huawei will not tolerate forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons.

Huawei Employee Business Conduct Guidelines + Codes of conduct for subsidiary employees: Incorporating compliance requirements into employee behavior



This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. We have detailed regulations and processes in place that cover each major phase of an employee's relationship with the company, including recruitment, employment, and exit. Our compliance management system and control framework are designed to ensure this remains an uncrossed red line. No incidents

of forced labour have taken place in our history.

As part of the Huawei hiring process, workers are always provided with a written employment agreement in their native language that contains a description of the terms and conditions of employment.

All work must be voluntary and workers shall be free to terminate their employment agreement with Huawei at any time with due observance of the agreed contract terms of notice and in accordance with local laws and regulations

RESPECTING HUMAN RIGHTS:

Huawei is committed to adhering to all applicable international conventions and national laws and policies, and respects all basic human rights as promoted by the Universal Declaration of Human Rights. We develop products and services in compliance with international standards and certifications. We strive to prevent our business activities from causing or contributing to any adverse impacts on human rights. Huawei has been a member of the United Nations Global Compact (UNGC) since 2004, and a member of the Responsible Business Alliance (RBA) since 2018. In addition, Huawei is committed to the UN Guiding Principles on Business and Human Rights (UNGPs) and standards

released by the International Labour Organisation.

The Huawei Corporate Sustainable Development Committee is responsible for overseeing any human rights risks that may exist within our business activities or supply chain, and strengthening our management of key areas that may impact human rights.

Huawei management of key areas with a potential impact on human rights



1. Ensuring technology is used to benefit humanity:

Technology should be used to enhance human, social, and environmental well-being. Huawei firmly opposes any use of technology that has an adverse impact on human rights. We carefully evaluate the long-term and potential impact of our new technologies on society, based on widely recognised industry standards, throughout the design, development, and use of our products, and work hard to ensure that our products and services are used in accordance with their intended commercial purpose.

1. Ensure that Technology is Used to Benefit Humanity



- Principles**
- Technology should be used to enhance human, social and environmental well-being
 - We evaluate impact of new technologies in design, development and use of our products
 - We work hard to ensure that our products and services are used in accordance with their commercial purpose. AI governance principles, product usage instructions, acceptable use policies, agreements with distributors and partners

- Processes**
- To address unknown risks from widespread use of new technologies, we have expanded existing processes and governance programs
 - Committed to working with our suppliers, partners and customers to manage any potential negative impact of technology development



To address the unknown risks that may arise from the widespread use of new technologies, Huawei has expanded its existing processes and governance programs, and we are committed to working with our suppliers, partners, and customers to manage any potential adverse impact of technology development.

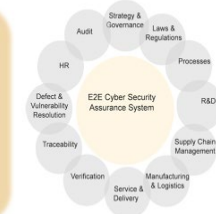
2. *Protecting privacy:*

Huawei attaches great importance to privacy protection, and we take our responsibilities seriously.

We are committed to complying with all applicable privacy laws worldwide, including China's Personal Information Protection Law and the EU's General Data Protection Regulation (GDPR). Huawei has embedded privacy protection requirements into our corporate governance and every phase of our personal data processing lifecycle.

2. Protecting Privacy

- Huawei attaches great importance to privacy protection
- We comply with all applicable privacy laws worldwide including EU GDPR
- Embedded privacy protection requirements into our corporate governance and every phase of our personal data processing lifecycle
- Follow principles of privacy and security by design and by default conduct privacy impact assessments before the release of any product or service
- Huawei also requires our suppliers to comply with requirements for personal data protection
- 473 Huawei privacy professionals have been certified by the International Association of Privacy Experts (IAPP), among the top companies globally



We follow the principles of privacy and security by design and by default and conduct privacy impact assessments before the release of any product or service, paying careful attention to sensitive personal data and sensitive usage. Huawei also requires its suppliers to comply with requirements for personal data protection. In addition, Huawei requires all of its employees to receive privacy training to enhance their understanding of the domain, and we encourage our employees to participate in professional privacy certification programs. More than 500 Huawei employees have been certified by the International Association of Privacy Professionals, placing Huawei among the top companies globally in this regard.

3. *Safeguarding labour rights:*

Huawei supports and protects the rights of its employees through detailed, equitable regulations that cover all stages of an employee's relationship with the company, including recruitment, employment, and exit.

We are committed to providing equal opportunities to all employees. When it comes to employee recruitment, promotion, and compensation, we do not discriminate against anyone on the basis of race, religion, gender, sexual orientation, nationality, age, or disability. We prohibit all use of forced labour, whether overt or covert, and all use of child labour.

3. Safeguarding Labour Rights



4. Maintaining a responsible supply chain:

Huawei has established a CSR management system for procurement in accordance with the UN's Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

The CSR agreements that we sign with suppliers are prepared according to internationally recognised industry standards such as the Responsible Business Alliance Code of Conduct, the Joint Audit Cooperation Supply Chain Sustainability Guidelines, and the IPC-1401 Corporate

Social Responsibility Management System Standard.

4. Maintaining a Responsible Supply Chain



- ✓ Huawei requires suppliers to respect the rights of their employees, build sustainability systems that conform to industry standards, and comply with legal requirements with regards to environmental protection, health and safety, privacy, and anti-bribery compliance
- ✓ We have a comprehensive qualification process for all new suppliers with guidelines based on the RBA Code of Conduct
- ✓ We carry out annual audits on current suppliers - all suppliers are evaluated based on their sustainability performance, the results of onsite audits, and the completion of any corrective actions
- ✓ We comply with our customers' sustainability requirements and any audit requests

During this process, Huawei also works closely with its supply chain partners, both upstream and downstream. In addition, we comply with our customers' sustainability requirements and conduct joint audits with them. We also require our direct suppliers to cascade our requirements to their sub-tier suppliers, asking them to respect the rights of their employees and comply with all legal requirements regarding environmental protection, health and safety, privacy, and anti-bribery compliance. Together, our goal is to create a responsible supply chain. Huawei has a comprehensive qualification process for all new suppliers, and carries out risk-informed annual audits on current suppliers. All suppliers are evaluated based on their sustainability performance, the results of audits, and the completion of any corrective actions. Huawei has a zero-tolerance policy towards the use of forced labour. If a supplier is found to have violated

this policy, we will take disciplinary action against them, such as terminating our business relationship. To date, no use of forced labour has been discovered among our suppliers.



Huawei shares supplier sustainability management practices at the 5th Telecom Industry Climate Change and Circular Economy Forum hosted by a customer.

Respecting human rights has been a long-standing focus for Huawei. While remaining committed to observing applicable laws, regulations, and standards, we actively communicate with international organisations, governments, and industry institutions to develop human rights standards and guidelines for the use of new technologies. At the same time, we will continue to optimize management mechanisms and work with our suppliers, partners, and customers to promptly identify, manage, and mitigate any human rights risks or adverse impacts.

CONTROL ENVIRONMENT:

A control environment is the foundation of an internal control system.

Huawei is committed to a corporate culture of integrity, business ethics, and compliance with laws and regulations.

In 2023, Huawei continued to enhance our compliance program across multiple compliance risk domains, including trade compliance, finance, anti-bribery corruption, intellectual property, trade secrets protection, cyber security and privacy protection (also recertifying against ISO 27701 certification for Privacy Management). We have engaged and collaborated openly and proactively with stakeholders including our customers, partners, and government regulators, to foster mutual understanding and trust.

This includes ongoing participation since 2019 in the annual anti-corruption/anti-bribery assessment and benchmarking programme with Transparency International for the UK deployment areas of our business.

Through ongoing efforts to strengthen compliance, Huawei continues to win the respect and approval of governments and partners around the world.

WHISTLEBLOWING:

We encourage all officers, employees, workers, contractors and agents to report any concerns or malpractice. Our policies facilitate an open and honest working

environment allowing disclosure to be made to our senior management without fear of victimisation or less favourable treatment. Employees can file concerns and complaints directly to their local Compliance Officer or through the following channels: The Committee of Ethics and Compliance (CEC); Business Conduct Guidelines (BCG) violation hotline; HR services complaints and suggestions hotline; grievance mailbox regarding performance appraisals; and the complaint and whistle-blowing mailbox regarding any procurement issues.

EMPLOYMENT MANAGEMENT COMMITMENT:

Huawei is committed to providing an inclusive working environment for all employees. When formulating and implementing human resource management policies and local rules, processes and regulations, we strictly abide by local laws and regulations and industry norms. We also respect the customs, beliefs and lifestyles of local employees, including setting up prayer rooms as an example, and strive to meet the needs of employees of different countries and religious beliefs. We have built auxiliary facilities such as gyms, coffee shops and nursing rooms to provide high-quality facilities and human services to our staff.

The Huawei Caring for Employees Policy specifies the general principles and requirements covering the care for all employees. Overseas subsidiaries develop and release localized policies based on local laws and regulations. In addition, we have developed relevant processes, systems, and baselines to continually create an open, inclusive, respectful, and diverse employment environment.

Huawei stipulates that there should be no discrimination on the basis of race, religion, gender, sexual orientation, nationality, age, pregnancy, or disability in recruitment, promotion, or remuneration. Huawei explicitly prohibits the use of forced, debt-paid, or indentured labour, and has made detailed and reasonable regulations on recruitment, employment, and exit to prevent the use of forced labour in specific practices. Huawei has never used forced labour within our operations.

Huawei explicitly prohibits child labour as part of its Caring for Employees Policy. We have formulated relevant policies and comprehensive preventive measures in the recruitment and employment of people to prevent the use of child labour.

We also extend this requirement to our suppliers and regularly monitor and audit

them to ensure they similarly do not use child labour.

Huawei respects employees' rights to freely associate and bargain collectively according to law. Huawei does not object to employees voluntarily participating in lawfully registered trade unions, provided that they do not violate local laws.

Huawei has also established and maintained an effective employee communication mechanism. Huawei can collect and understand employees' opinions and suggestions through various means, such as the Manager Feedback Plan (MFP), organisational climate survey, and departmental HRBP. Employees can also make complaints about related issues through the CEC complaint hotline, HR service complaint hotline, and suggestion reception hotline.

The era of globalization requires the integration of diversity. Huawei attaches great importance to the globalization and diversification of our operations. To facilitate smooth communication and communication between Chinese and overseas employees, enhance the cross-cultural awareness of managers and employees at all levels, and build a diverse team with mutual trust, Huawei has launched multiple training courses, such as Diversity Management

Course, Adaptation for International Assignments, and Cross-cultural Awareness. In 2023, we promoted the course Cognitive Diversity Theory: Why We Emphasize Diversity and Inclusion for HR professionals through an internal website, and pushed it to HR teams at all levels and related domains. With this course, we want more HR professionals and managers to realize how a diverse workforce can generate greater synergy and better benefit the organisation as a whole. This can encourage them to work harder to develop a more diverse, inclusive team.

HUMAN RESOURCE MANAGEMENT:

Across recruitment we state that "no fees will be charged for job seekers during the recruitment process" and "no fees will be charged for the physical examination for new hires"; we also provide details of the complaints hotline and complaints email address as an additional level of caution. That way, we ensure there is no charge for job seekers during the recruitment process, and the medical examination is free of charge.

Attendance management: We manage attendance in strict accordance with the RBA 7.0 standard through routine scheduling, overtime control (briefing), and real-time monitoring in the MeHR system.

Overtime management: We reasonably arrange employees to work overtime as needed, based on business fluctuations and employees' willingness. Employees can proactively apply for overtime, and the overtime can be performed only after supervisor approval. Employees shall be paid in strict accordance with the specified worked time.

Leave management: Employees can apply for leave if they need to handle non-work affairs during working hours.

Child labour: According to applicable national laws and regulations as well as Huawei policy requirements, we strictly prohibit the recruitment and use of child labour. We have not found any infringements of these rules.

Communication and Feedback: We have also established employee communication mechanisms as part of our efforts to create an open, inclusive workplace that encourages mutual respect and diversity. For example, we gather our employees' opinions and suggestions through our organizational climate survey, Manager Feedback Program (MFP), the manager open day program, and more. Employees can also report violations, file complaints, and seek assistance through multiple channels such as the dedicated complaint mailbox of our Committee of Ethics and Compliance (CEC) and our HR service hotline.



On the Huawei Songshan Lake campus

SUSTAINABLE SUPPLY CHAIN MANAGEMENT, MONITORING AND COMPLIANCE:

Huawei endorses the UN Guiding Principles on Business and Human Rights and is serious about the societal and environmental impact of our global procurement and supply chain. We have teamed up with customers and suppliers to further the sustainable development of our global supply chain. We have incorporated CSR requirements into both our Quality First strategy and activities that take place across all of our value chain. We offer premium prices to suppliers that offer higher quality in a bid to encourage them to improve their CSR performance. We have also integrated CSR requirements into our global procurement processes, from material and supplier qualification, selection, and appraisal to performance management and procurement fulfilment.

PROCUREMENT CSR MANAGEMENT SYSTEM

Huawei has established its procurement CSR management system based on the OECD Due

Diligence Guidance for Responsible Business Conduct and the IPC-1401 Corporate Social Responsibility Management System Standard, and incorporated CSR requirements into our procurement strategy and business processes.

Procurement CSR Management System



We require suppliers to comply with all applicable laws and regulations, encourage supplier diversity and encourage suppliers to adopt internationally recognised industry standards and continually improve CSR capability. Our Supplier CSR Agreement is prepared according to the Responsible Business Alliance (RBA) Code of Conduct and the Joint Audit Cooperation (JAC) Supply Chain Sustainability Guidelines. This agreement covers five areas: labour standards, health and safety, environmental protection, business ethics, and management systems. Huawei sees the use of child labour or forced labour as red-line issues, and we have zero tolerance for violations of CSR red lines.

HUAWEI CSR RED LINES IN PROCUREMENT:

These include:

1. Use of child labour.
2. Use of prison labour (including using prisons as suppliers or subcontractors) or forced labour (including restricting personal freedom or detaining personal identity documents.)
3. Violence, physical punishment, sexual harassment, illegal body searches, cross-gender body searches, and other similar behaviour.
4. Salary payments below the local minimum wage.
5. Negligence that leads to major fires or explosions.
6. Working conditions that seriously endanger personal health and safety or lead to fatal field incidents.
7. Illegal emissions of any hazardous or toxic wastes, including waste water, gas, and residue.
8. Negligence that leads to media crises or serious mass disturbances, such as collective labour disputes, mass brawls, mass poisoning, unnatural deaths, or other incidents causing casualties.
9. Unsafe and unhealthy working environments that lack effective measures to prevent potential health and safety accidents, or diseases that may be caused due to exposure in workplaces (e.g., collective infections).
10. Corruption or dishonest acts that violate the requirements of "no bribery, no gifts, no conflicts of interest, no falsification, no

cutting corners, no fraud, and keeping promises".

TRAINING:

To support the strategic goal of sustainable procurement, we regularly deliver CSR training to all members of the procurement team. This training covers CSR agreements, red lines, processes, and audit practices related to CSR in procurement. CSR requirements are incorporated into the performance indicators of all teams in our procurement department.

In 2023 Huawei UK delivered detailed MSA-related training across a number of operational functions, including Procurement, Supply Chain Management, Human Resources, Legal and Financial Accounting.

SUPPLIER RISK RATING AND AUDITING:

Huawei conducts supply chain due diligence using a risk-based approach. We work with suppliers to identify CSR risks and opportunities, and take actions to prevent and mitigate CSR risks. Every year, we assess all major suppliers, which represent 90% or more of our procurement spending, and assign each supplier one of three risk ratings (high, medium, or low). We develop an annual sustainability audit plan to deal with suppliers that are assessed as posing medium or high risk. In addition, we perform onsite assessments on all potential suppliers to examine their sustainability systems. No company that fails the assessment is eligible for consideration to become a Huawei supplier.

In 2023, we further refined our supplier CSR risk rating methodology. We now evaluate each supplier's CSR performance and the effectiveness of their risk prevention and management system by focusing on five criteria: CSR performance rating, health and safety risk, environmental risk, labour risk, and audit results.

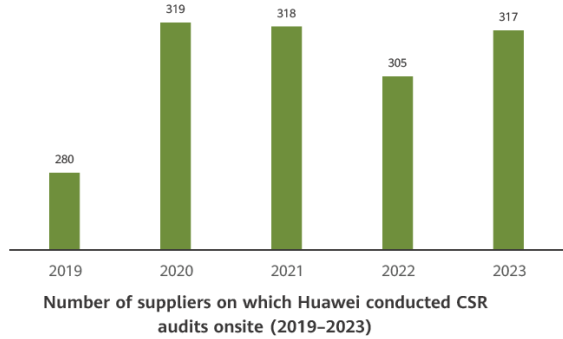


Criteria of supplier CSR risk assessment

We pay special attention to the improvements made by suppliers posing medium and high risks.

To better meet customer requirements, we have prepared and continued to update our Supplier CSR Audit Checklist in accordance with industry best practices.

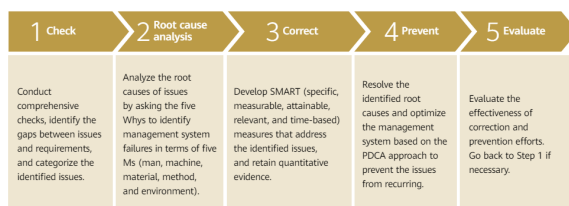
We conduct supplier CSR audits using internationally recognised methods such as onsite inspections, employee interviews, management interviews, documentation reviews, and online searches.

Table 1: Supplier CSR on-site audits 2019-2023

We also use the Blue Map database developed by the Institute of Public and Environmental Affairs (IPE) to assess supplier compliance with environmental requirements. In 2023, seven suppliers resolved identified issues within a specified timeframe with the support of Huawei.

In 2023, we assigned CSR risk ratings to over 1,600 major suppliers using the new methodology. We also conducted 317 onsite CSR audits and more than 900 onsite EHS reviews on engineering subcontractors.

If we find an issue during an onsite audit, we help the supplier resolve the issue using the CRCPE methodology (check, root cause analysis, correct, prevent, and evaluate). This methodology helps suppliers identify common problems and develop targeted solutions.



Note: In 2023, we found no cases of child labour or forced labour in our supply chain. We have followed up with our suppliers to rectify a small number of management

system findings related to process improvements.

SUPPLIER PERFORMANCE MANAGEMENT

Every year, Huawei appraises suppliers' sustainability performance as part of their overall performance appraisals. During this process, we also consider how they manage the sustainability of their own suppliers. Suppliers are classified into four grades (A, B, C, or D) based on their sustainability performance. In 2023, we appraised the sustainability performance of more than 1,600 major suppliers.

The amount of business we do with each supplier depends partly on their sustainability performance, which is also a factor considered in our tendering, supplier selection, portfolio management, and other processes. Where suppliers are equally matched in other factors, those that perform better in sustainability are given priority for the share of business or business opportunities.

The reverse is true for low-performing suppliers. Depending on the situation, we may instruct suppliers with poor sustainability performance to resolve existing issues within a specified timeframe.

Alternatively, we may reduce their share of business or offer them fewer business opportunities. We may even terminate our business relationships with those that display exceptionally poor sustainability performance.

SUPPLIER CAPABILITY IMPROVEMENT

As part of our efforts to help suppliers perform more sustainably, we regularly provide them with sustainability training and coaching.

Huawei CSR training for suppliers



We also encourage our suppliers to adopt industry best practices and embed sustainability requirements into their business strategies to reduce operating risks and boost efficiency. Furthermore, we invite leading suppliers from different industries to share their experience in dealing with risky items and scenarios such as printed circuit boards (PCBs), lithium batteries, and hazardous chemicals.

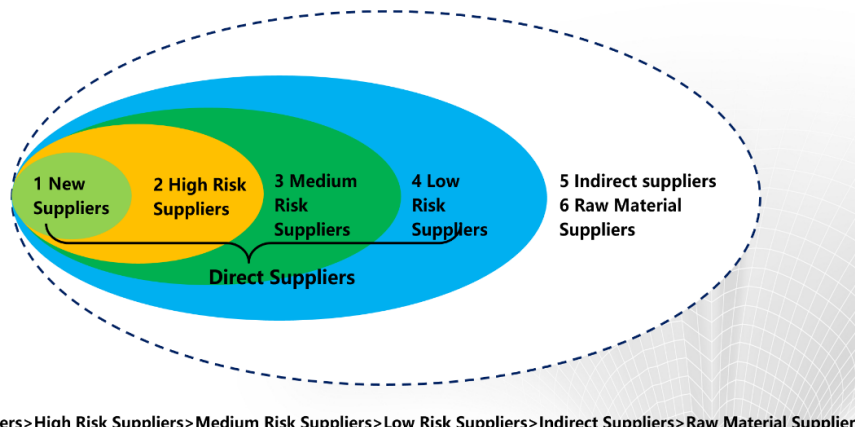
We encourage our suppliers to adopt industry best practices and embed

sustainability requirements into their business strategies to reduce risk and boost efficiency. We encourage our suppliers to learn from each other and grow together through benchmarking. This model includes the following steps:

1. Setting priorities: We ask suppliers about their CSR concerns, list the most common issues, and rank them in order of priority.
2. Identifying benchmarks: We identify which suppliers perform best and analyze their best practices.
3. Sharing and learning: We invite the benchmark suppliers to share their best practices and encourage all suppliers to learn industry standards and norms.
4. Implementation: We ask experts to develop templates and checklists and help suppliers assess their own performance and introduce best practices.

In 2023, we invited 15 industry-leading suppliers to share their best practices in EHS, and more than 500 suppliers participated in these sessions. In addition, over 600 of our suppliers' managers have passed Huawei online exam on production safety and red lines.

Risk Based Supplier Monitoring Approach



STAKEHOLDER ENGAGEMENT AND COOPERATION

Huawei maintains close engagement and collaboration with industry stakeholders. Together with the upstream and downstream partners in our supply chain, we drive CSR standardization, perform CSR-related due diligence, and make continued efforts to improve CSR management and supply resilience. We work hand-in-hand with our partners to build a responsible supply chain.

RESPONSIBLE MANAGEMENT OF MINERALS

Huawei is committed to and works to drive the responsible procurement of products containing raw materials, including tin, tantalum, tungsten, gold (3TG), cobalt, and mica. We have established a risk-based responsible mineral management system in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct and the Chinese Due Diligence Guidelines for Mineral Supply Chain. The responsible management of minerals is an integral part of our procurement CSR management system, and has been embedded within supplier qualification, supervision, and auditing processes. As a downstream company in the mineral supply chain, Huawei does not directly purchase any minerals, and there are at least seven tiers between Huawei and mining companies. We require that our suppliers do not purchase conflict minerals, and ask them to cascade this requirement to their own suppliers, in order to prevent or reduce the risk that minerals contained in their products may directly or indirectly support human rights abuses, harm the

environment or personal health and safety, or breed corruption. Huawei also actively works with global industry peers through industry initiatives like the Responsible Minerals Initiative (RMI) and the Responsible Critical Mineral Initiative (RCI). Together with partners up and down the supply chain, we conduct supply chain surveys, create a complete list of all related smelters, and push these smelters to apply for or maintain the Responsible Minerals Assurance Process (RMAP) certification.

In 2023, in response to the RMI's call, Huawei added mica to its list of due diligence on responsible mineral management. This means that we now identify suppliers of six minerals: tin, tantalum, tungsten, gold (3TG), cobalt, and mica. According to the Conflict Minerals Reporting Template (CMRT) and the Extended Mineral Report Template (EMRT), we urge suppliers to identify and investigate all smelters within their supply chains, and our suppliers must require that no identified smelters purchase minerals from conflict-affected and high-risk areas (CAHRAs), and urge smelters that have not obtained the RMAP certification to get the certification within a specified timeframe when necessary.

Huawei Statement on Responsible Mineral Supply Chain Due Diligence Management:

<https://www.huawei.com/en/declarations/huawei-statement-on-responsible-mineral-supply-chain>

MONITORING:

Huawei has established an internal complaint channel, an investigation mechanism, an anti-

corruption mechanism, and an accountability system. The Agreement on Honesty and Integrity that Huawei has signed with its suppliers clearly stipulates that suppliers may report improper conduct by Huawei employees through the channels stipulated in the Agreement to assist the company in monitoring the integrity of its employees.

The internal audit department independently assesses the overall status of the company's internal controls, investigates any suspected violations of the BCGs, and reports the audit and investigation results to the Audit Committee (AC) and senior management. Huawei has also implemented a mechanism for internal control appraisals of Global Process Owners (GPOs) and regional managers, holding them accountable and pursuing impeachment when and where necessary.

The AC and the CFO regularly review the company's internal control status, and listen to and review reports on action plans for improving internal controls and plan execution progress. Both have the authority to request the relevant GPOs or business executives to explain their internal control issues and take relevant and timely corrective actions.

LOOKING TO THE FUTURE:

In order to assess the effectiveness of the measures it has taken, Huawei will regularly review and continue to optimise its policies and procedures in relation to modern slavery and human trafficking. We will include updates on any further improvements and

actions we have taken in future statements. We foresee partnerships with our key customers and suppliers to explore specific areas of common concern, and shall explore improved supplier assessment methods into the second and third tier.

To ensure all of the assessment measures are easily identifiable, we shall repeat some of the measures referred to earlier in this statement such as partner/supplier performance measurement and audits, how whistle-blower complaints are handled, and intend to expand upon our training interventions.

The Employee Business Conduct Guidelines has been updated in 2024 H1.

In 2024 Huawei UK plans to collaborate with BSI on a review of BS 25700:2022 Organisational Responses to Modern Slavery: Guidelines.

ADDITIONAL STEPS 2023:

In line with our previous Modern Slavery Statements, and in looking to the future, Huawei has taken the additional actions highlighted above to ensure full compliance and to strengthen our position on Modern Slavery.

Huawei has continued to expand our supply chain investigations and have extended the assessments and investigations across internal operations. Huawei has worked to increase awareness both within the business and with those whom we work, to develop an understanding of Modern Slavery and the measures employees can take to prevent it from occurring within all aspects of the Huawei organisation.

In 2023, we strengthened our governance and legal compliance approach through detailed compliance registers.

HWUK and UKRD conducted detailed training across a number of operational functions in 2023, including Procurement, Supply Chain Management, Human Resources, Legal and Financial Accounting.

In March 2023, Huawei again published its policy on Human Rights in its Annual Report bringing together principles and practices across the whole business.

We have also continued the assessment of suppliers at the UK local level with respect to their MSA-related reporting, initiatives and controls.

INCREASED AWARENESS: INTERNAL

The Huawei internal iLearning system is, in essence, the backbone of self-help training within the organisation. Regularly, employees are required to complete mandatory training courses, both technical and legal compliance-oriented, which include presentation materials or videos followed by an exam to test the individuals' understanding of the key learning points. Huawei repeated training to all staff globally to ensure awareness of the employee's right to whistle-blowing should they identify a need to report any concerns of malpractice. The aim is to ensure that employees understand their rights within the workplace and their responsibility in participating to ensure legal compliance.

HWUK and UKRD also rolled out MSA-related training to all relevant operational functions to drive both internal and supply chain compliances.

INCREASED AWARENESS: EXTERNAL

Huawei has committed to ensuring Modern Slavery is not occurring anywhere within its operations, including within its suppliers and business partners. Huawei has also updated the way partners and suppliers are assessed and audited. The Huawei audit plan includes a section on Modern Slavery, such that all Huawei suppliers' and partners' arrangements are assessed against the prevention responsibilities associated with the Modern Slavery Act.

Huawei has also hosted numerous supplier conferences and training programmes in which representatives from key suppliers are required to attend. Huawei has incorporated Modern Slavery into the agenda of these conferences and interventions with the aim of increasing awareness down our supply chain of the risks and to share good practices, extended to include such interventions in selected local operations in 2024.

APPROVAL & SIGNATURE:

In accordance with the Modern Slavery Act 2015, Section 54(1) and published guidance, this Statement for the financial year ended 31 December 2023 on our efforts to combat human trafficking and modern-day slavery in our business and supply chains was approved by the boards of directors for the following Huawei entities that fall under the reporting requirements within UK law, and has been signed by the undersigned director for and on behalf of Huawei Technologies (UK) Co.,

Ltd. and Huawei Technologies Research &
Development (UK) Limited.

Dated: 28 (xy)th June 2024

Signed:



(Name), Lida Yan

Director of Huawei Technologies (UK) Co., Ltd.

Director of Huawei Technologies Research &
Development (UK) Limited.