



大金重工人权政策声明

Dajin Heavy Industry Policy Statement of Human Rights

文件编号：DJ-G-ZL-A24-05 版本号 A

Document Number: DJ-G-ZL-A24-05 Version A



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编制 Compiled by	毛安源		2024.08.09
审核 Audited by	王晓彬		2024.08.09
批准 Approved by	庞慧茹		2024.08.12

更改记录 Records of Update		
版本 Version	修订内容 Amendments	日期 Date
1	增加维生工资目标内容 Added content to target for subsistence wage	2025.3.6



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大金重工股份有限公司清晰地认识到人权问题对于我们的雇员、客户、供应商、运营所在的社区及民间社会团体等利益相关方而言都十分重要。本公司严格遵守《中华人民共和国宪法》《中华人民共和国劳动法》《中华人民共和国劳动合同法》《中华人民共和国妇女权益保障法》《中华人民共和国就业促进法》

《中华人民共和国未成年人保护法》《中华人民共和国工会法》《禁止使用童工规定》《女职工劳动保护特别规定》等国内相关法律法规以及海外运营地的适用规定，同时参考《世界人权宣言》《保护人权宣言》《联合国消除一切形式种族歧视宣言》《国际劳工组织关于工作中基本原则和权利宣言》《准予就业最低年龄公约》《就业政策公约》《歧视（就业及职业）公约》；《对男女工人同等价值的工作付予同等报酬公约》等联合国公约及宣言，制定人权政策声明，旨在规定本公司自身运营、供应商和其他合作伙伴对于人权问题的承诺和责任。

该政策适用于大金重工股份有限公司及其所有下属公司（蓬莱大金海洋重工有限公司、张家口大金风电装备有限公司、阳江大金风电海洋工程科技有限公司、兴安盟大金重工有限公司、盘锦大金海洋工程有限公司）。

Dajin Heavy Industry Co., Ltd. clearly recognizes that human rights issues are crucial for stakeholders such as our employees, customers, suppliers, communities where we operate, and civil society groups. The Company strictly abides by and implements the domestic laws and regulations such as Constitution of the People's Republic of China, Labor Law of the People's Republic of China, Labor Contract Law of the People's Republic of China, Law of the People's Republic of China on the Protection of Women's Rights and Interests, Employment Promotion Law of the People's Republic of China, Law of the People's Republic of China on the Protection of Minors, Trade Union Law of the People's Republic of China, Provisions on the Prohibition of Using Child Labor, Special Provisions on Labor Protection of Female Employees, and laws and regulations concerning human rights issues of our overseas operation sites. In addition, the Company implements UN conventions and declarations such as the Universal Declaration of Human Rights,^{2/8} Declaration on the Protection of Human



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Rights, the United Nations Declaration on the Elimination of All Forms of Racial Discrimination, ILO Declaration on Fundamental Principles and Rights at Work, Convention concerning Minimum Age for Admission to Employment, Employment Policy Convention, Discrimination (Employment and Occupation) Convention, Convention concerning Equal Remuneration for Men and Women Workers for Work of Equal Value. Concerning the aforementioned laws and regulations, the Company has developed the Policy Statement of Human Rights aimed at defining the commitments and responsibilities of the Company and its affiliated companies, suppliers, and other partners regarding human rights issues.

The policy applies to Dajin Heavy Industries Co., Ltd. and all its subsidiaries (Penglai Dajin Offshore Heavy Industry Co., Ltd., Zhangjiakou Dajin Wind Power Equipment Co., Ltd., Yangjiang Dajin Wind Power Offshore Engineering Technology Co., Ltd., Xing'anmeng Dajin Heavy Industry Co., Ltd. and Panjin Dajin Offshore Engineering Co., Ltd.)

1、禁止强制或强迫性劳工

1. PROHIBITION OF FORCED OR COMPULSORY LABOR

本公司禁止在惩罚和威胁下榨取劳工的利益和强迫员工工作。本公司聘用所有员工必须以自愿为原则，绝不允许有任何强迫性行为，不利用欺骗手段引诱员工工作。同时，本公司一律不得收取押金、保证金或扣押其身份证和其它法定证明文件，以违背员工意愿强行使用劳动力。

The Company prohibits the exploitation of labor benefits and the forcing of employees to work under punishment and threats. All employees hired by the Company must be on a voluntary basis, and no coercive behavior is allowed. We will not use deception to lure employees to work. At the same time, the Company is not allowed to collect deposits, guarantees or seize their ID cards and other legal proof documents to forcibly use labor against the wishes of employees.

2、禁止使用童工



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PROHIBITION OF USING CHILD LABOR

本公司承诺在提供服务的任何阶段禁止使用童工。

“童工”指未满 16 岁，或未满完成义务教育年龄，或未满国家规定的最低就业年龄而被聘用的人员。所有 18 岁以下员工不得从事有可能危及到未成年人身体健康或安全的工作。对于境外雇佣，童工的界定以各项目所在国法律为准。

The Company promises to prohibit the use of child labor at all stages of service provision.

“Child labor” refers to the persons who are under the age of 16, or under the age of completing compulsory education, or the persons who are employed under the minimum employment age specified by the state. All employees under the age of 18 shall not engage in the work that is likely to endanger the health or safety of the minors. For overseas employment, the definition of child labor based on the laws of each project country.

3、尊重用工多样性并反对歧视

3. RESPECT EMPLOYMENT DIVERSITY AND OPPOSE DISCRIMINATION

本公司承诺提供公平合理的工作机会，在决定聘用、报酬、培训、升职、降职或退休等劳动事务时，根据个人的工作能力和工作需要做出决定，而不是根据种族、国籍、宗教、残疾、社会阶层、性别取向、工会会员资格和政府关系等方面的因素做出决定。本公司倡导多元化和包容性的员工队伍和工作环境，高级管理层对公司员工的多元化负责，定期面向全体员工开展有关于多元化、工作环境包容性和反歧视的培训。

The Company promises to provide fair and reasonable job opportunities. When making decisions on employment, compensation, training, promotion, demotion, or retirement, decisions are made based on individual work abilities and needs, rather than factors such as race, nationality, religion, disability, social class, sexual



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orientation, union membership, and government relations. The Company advocates for a diverse and inclusive workforce and work environment. Senior management is responsible for the diversity of our employees.

本公司对歧视现象持“零容忍”态度，承诺员工免受非法歧视，不得强迫员工或要求员工接受带有歧视性的医学检查，并允许员工或其他当事人通过举报邮箱对违规情况进行举报。经调查违反有关规定的人员将受到公司内部处分，涉事单位应当制订整改计划并做出说明；对当事人造成损害的，应当承担赔偿责任。

The Company holds a “zero tolerance” attitude towards discrimination and promises that employees will not be subjected to illegal discrimination. We will not force or require employees to undergo discriminatory medical examinations, and allow employees or other parties to report violations through the reporting email. Personnel who violate relevant regulations will be subject to internal punishment by the Company, and the involved units should provide the rectification, and if damage is caused to the parties, they shall bear the liability for compensation.

4、结社自由

4. FREEDOM OF ASSOCIATION

员工与管理层之间公开直接的沟通是解决工作场所问题和薪酬问题的有效方法之一。本公司致力于依法尊重员工的权利，包括自由结社、参加或不参加工会、寻求代表、参加职工代表大会等权利。员工应能够在不用担心报复、威胁或骚扰的情况下，公开地就工作条件和管理问题与管理层沟通。

Open and direct communication between employees and management is one of the effective ways to address workplace and salary issues. The Company is committed to respecting the rights of employees in accordance with the law, including freedom of association, participation or non-participation in trade unions, seeking representation, and participating in employee representative conferences. Employees should be able to openly communicate with management on work conditions and management



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issues without worrying about retaliation, threats, or harassment.

5、公正有利的工作条件

5. FAIR AND FAVORABLE WORKING CONDITIONS

本公司关注员工身心健康，确保工作场合的污染物、废弃物规范管理，实行严格的安全生产管理体系，为员工创造安全、文明、和谐的工作、生活条件和人文环境，保障员工职业卫生安全。

The Company focuses on the physical and mental health of employees, ensures standardized management of pollutants and waste in the workplace, implements a strict safety production management system, creates safe, civilized, and harmonious working and living conditions and cultural environment for employees, and ensures their occupational health and safety.

本公司明确规定员工的工作时数以及员工拥有的年休假和各类休假时数，维护员工休息休假的权利。

The Company clearly stipulates the working hours of employees, as well as the annual leave and various leave hours they have, to safeguard their right to rest and take leave.

本公司致力于尊重员工的人格和尊严，严禁侮辱、体罚、殴打、非法搜查和拘禁劳动者的行为。各部门对所有员工不准因工作中的差错而对其进行肉体上或精神上的惩罚，给其造成心理压力。同时，本公司对工作场合的性骚扰和非性骚扰持“零容忍态度”，并允许员工或其他当事人通过举报邮箱 hr@dajin.cn 对违规情况进行举报，经调查违反有关规定的人员将受到公司内部处分，涉事单位和责任人应就整改计划做出说明；对当事人造成损害的，应当承担赔偿责任。

The Company is committed to respecting the personality and dignity of employees and strictly prohibits insults, corporal punishment, beatings, illegal searches, and detention of employees. All departments shall not punish any employee physically or



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mentally for their mistakes in work, which will cause psychological stress. At the same time, the Company maintains a “zero tolerance” attitude towards sexual and non-sexual harassment in the workplace and allows employees or other parties to report violations through the reporting email hr@dajin.cn. Those who violate relevant regulations will be subject to internal punishment by the Company, and the units and responsible persons involved should provide explanations on the rectification plan; if damage is caused to the parties, they shall bear the liability for compensation.

本公司根据领先的人才战略配套实施符合市场水平的薪酬定位，并通过定期的市场洞察不断校正薪酬定位与人才战略定位的一致性程度。本公司支付给员工的工资应符合所有适用的法律法规，包括有关最低工资、加班时间和法定福利的法律，并承诺工资水平不因性别、种族和年龄等因素而有所差距，定期通过员工薪资水平分析开展“同工同酬”评估工作，并根据评估结果推进改进措施落实，致力实现“同工同酬”的薪酬策略。

The Company implements a salary positioning that is in line with the market level based on leading talent strategies, and continuously corrects the consistency between salary positioning and talent strategy positioning through regular market insights. The wages paid by the Company to employees should comply with all applicable laws and regulations, including laws related to minimum wages, overtime hours, and statutory benefits. We promise that the salary level will not differ due to factors such as gender, race, and age. We regularly conduct “equal pay” evaluations through the analysis of the salary levels of all employees and promote the implementation of improvement measures based on the evaluation results, striving to achieve the “equal pay” salary strategy.

公司承诺尊重和保障员工的基本生活权利，目标于2030年前实现全员薪酬不低于当地维生工资。我们将参考国际公认的方法，定期评估和调整工资水平以确保员工及其家庭能够获得体面生活所需的基本需求。公司将持续推动工资



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透明，接受利益相关方监督，促进社会公平与可持续发展。

The Company is committed to respecting and safeguarding the basic living rights of our employees, and aims to achieve a salary for all employees that is no less than the local living wage by 2030. We will refer to internationally recognized methods to regularly assess and adjust wage levels to ensure that employees and their families have access to the basic needs required for a decent life. The Company will continue to promote wage transparency and accept stakeholder monitoring to promote social equity and sustainable development.<

6、附则

6. SUPPLEMENTARY PROVISIONS

本公司将每年依据所在国法律、相关国际公约和事实情况的变化而对本政



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策声明进行修订，确保本制度有效实施。本公司制定监督程序，定期依据本政策声明对公司人权问题管理的有效性进行检查，并每年制定人权问题相关目标，依据目标不断提升公司人权问题管理能力。

The Company will revise this Policy Statement annually based on changes in the laws, relevant international conventions, and factual circumstances of the host country to ensure the effective implementation of this system. The Company has developed monitoring procedures, regularly checked the effectiveness of the Company ' s management of human rights issues according to this Policy Statement, and formulated human rights related targets every year, and constantly improved the Company ' s human rights management ability according to the targets.

除自身业务运营之外，本公司在上下游价值链以及新拓展业务（收并购、联营）过程中均会通过线上或线下审核的形式对潜在的人权问题进行识别，涵盖强制劳工、雇佣童工、结社自由、集体谈判、同工同酬和歧视等多项议题，该识别每年定期开展或在新拓展业务、新纳入供应商前期视需要开展。

In addition to our own business operations, the Company will identify potential human rights issues through online or offline audits in the upstream and downstream value chains, as well as in the process of new business expansion (mergers and acquisitions, joint ventures), covering multiple issues such as forced labor, child labor, freedom of association, collective bargaining, equal pay for equal work, and discrimination. This identification is conducted regularly every year or as needed in the early stages of new business expansion and supplier inclusion.

(The English translation of the Policy Statement is for reference only and the Chinese version shall prevail in case of any inconsistency between the Chinese version and English translation thereof)