

AN INTRODUCTION TO HUAWEI:

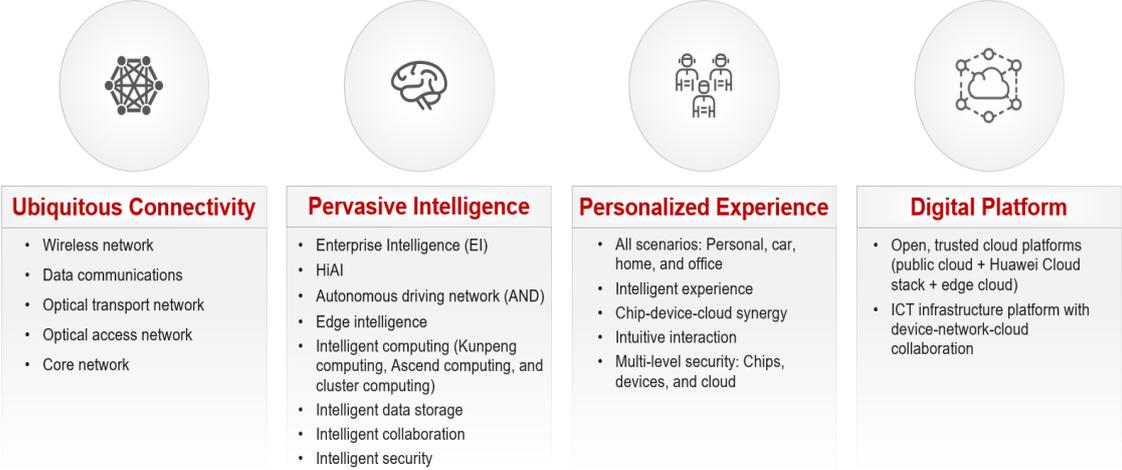
This statement covers the activities of the entire Huawei Group (hereinafter refer to as “we”, “our” or “Huawei”), including Huawei Technologies (UK) Co., Ltd. (04295981), Huawei Global Finance (UK) Limited (09227217), and Huawei Technologies Research & Development (UK) Limited (07371283) registered in United Kingdom (hereinafter refer to as “UK”) during the fiscal year ended 31 December 2021; and is prepared in accordance with the reporting requirements of the UK Modern Slavery Act 2015 (hereinafter refer to as “MSA”).

WHO WE ARE AND WHAT WE DO

Huawei is a leading global provider of information and communications technology (ICT) infrastructure and smart devices, headquartered in Shenzhen, Guangdong Province, P.R. China. We are committed to bringing digital to every person, home and organization for a fully connected, digital world.

To accomplish this, Huawei provides a broad range of ICT capabilities to help all industries go digital. Through continual innovation, we help industries digitalize their supply chains to more effectively cope with challenges and disruption. We firmly support free trade, open markets, and fair competition – especially the free trade of tech products. We are doing everything we can to drive the healthy development of global supply chains.

Building a fully connected, intelligent world



Huawei’s ICT solutions, products and services are used in more than 170 countries and regions, serving more than 3 billion people around the world with 2021 global revenues of US\$99.9 billion. By the end of 2021, Huawei had approximately 195,000 employees worldwide, of which well over one half were in Research & Development (“R&D”). R&D spend in 2021 was equivalent to 22.4% of the Huawei annual revenue. Huawei is a major investor in the UK, supporting thousands of jobs directly and across its UK supply chain.

STRUCTURE OF THE ORGANISATION:

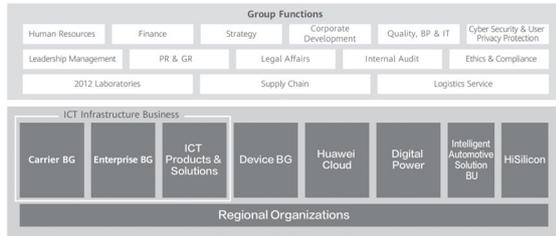
Huawei Technologies Co., Ltd. is a wholly owned subsidiary of Huawei Investment & Holding Co., Ltd. Reference to “we”, “our” or “Huawei” in this Statement on Modern Slavery (“Statement”) refers collectively to Huawei Technologies Co., Ltd., a company incorporated in China, and its direct and indirect subsidiaries and affiliates including Huawei Technologies (UK) Co., Ltd. Huawei Global Finance (UK) Limited, and Huawei Technologies Research &

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Development (UK) Limited. 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 defined in the MSA, also publishing a similar and equivalent statement based on the requirements of the Australia Modern Slavery Act 2018.



On the Huawei Songshan Lake campus

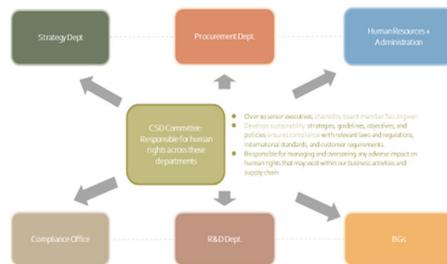
THE HUAWEI POSITION ON MODERN SLAVERY:

Huawei is committed to ensuring that there is no modern slavery, human trafficking or child labour within its supply chains or in any part of its own business operations. The Huawei Caring for Employees Policy, reviewed and revised at the end of 2021 and released in early 2022, and our Sustainable Development Policy, revised and released early in 2021, both 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 is not taking place anywhere throughout the business. Specific sections of this policy cover

such areas as the strict prohibition of child labour forced or involuntary labour, humane treatment, working hours, and compensation and benefits.

In detail, 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.

Strengthening organization structure to manage key areas of human rights



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).

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 as defined above. Should Huawei employ juveniles, as defined above, we shall do so in full compliance with applicable local

laws, regulations and industry standards. We shall not assign juvenile workers to any work that may jeopardize their physical or mental health or safety.

In addition, we respect our employees and value their self-esteem. We do not resort to violence nor to 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, which must be applied for beforehand and approved, it must not exceed three hours per day, and each employee must take off at least one day per week.

Huawei Technologies Co., Ltd. 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, Huawei's 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 of 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 and political and cultural differences.

In order to assess geographic risks we conduct country risk mapping via the following internationally-recognized indices for us to focus on those higher-risk countries and priority issues:

- World Bank Worldwide Governance Indicators
- ITUC Global Rights Index
- Yela 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. (Please refer to additional details later in this report.)

PREVENTING MODERN SLAVERY - THE HUAWEI STRATEGY:

INTERNAL CONTROL AND EXTERNAL COMPLIANCE:

Huawei continued to improve its internal control system in 2021, based on its organizational 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, US Department of Justice's 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 (initially with its precursor, the ISO 19600 Guidance). 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 through 2021.

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. 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 is designed to ensure this remains an uncrossed red line. No incidents of forced labour have ever taken place in Huawei's 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 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.

BUSINESS ETHICS:

We conduct business with integrity, adhere to standard business ethics practices, and observe all applicable laws and regulations in the countries and regions in which we operate. This is a guiding principle for our management team.

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.

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



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.

RESPECTING HUMAN RIGHTS:

Huawei adheres to all applicable international and national laws and policies through developing business processes, products and services in compliance with those national and international laws, standards and certifications. Huawei respects all basic human rights as promoted by the Universal Declaration of Human Rights, ensuring our business activities do not adversely impact human rights. In March 2021, Huawei published its policy on Human Rights in its Annual Report bringing together principles and practices across the whole business.

Huawei has been a member of the United Nations Global Compact (UNGC) since 2004, and is also a

member of the Responsible Business Alliance (RBA). In addition, Huawei is committed to the United Nations Guiding Principles on Business and Human Rights and standards released by the International Labour Organization (ILO), among others.

Huawei believes that connectivity is a basic right for every human being. We are committed to building better network connectivity and providing convenient and affordable information and communications services to billions of people around the world using our innovative technologies. Ubiquitous broadband and connectivity will create new jobs, promote development, decrease poverty, and improve quality of life. In addition, connectivity will help us respond to global challenges, reduce the human impact on the environment, and provide essential communications services to support rescue and relief efforts during natural disasters.

Key Areas of Huawei Human Rights Management:

Building on its existing corporate sustainable development organization, Huawei has strengthened its management of key areas that may have an impact on human rights. Our Corporate Sustainable Development team is responsible for managing and overseeing any adverse impact on human rights that may exist within our business activities and supply chain across four key areas:

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



1. **Ensure technology is used to benefit humanity:** Technology should be used to enhance human, social, and environmental well-being. Huawei opposes the misuse of technology that may have an adverse impact on human rights. We carefully evaluate the long-term and potential impact of our new technologies on society in the

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design, development, and use of our products, and work hard to ensure that our products and services are used in accordance with their 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. All 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, committing to working with our suppliers, partners, and customers to manage any potential negative impact of technology development.

2. Protecting privacy:

Huawei attaches great importance to privacy protection, and we take our responsibilities seriously. We comply with all applicable privacy laws worldwide, including the EU General Data Protection Regulation (GDPR) and DPA 2018. Huawei has embedded privacy protection requirements into our corporate governance and every phase of our personal data processing lifecycle, with verification of these arrangements achieved through 3rd party certification to ISO 27701 (Privacy) and ISO 27001 (Information Security) management systems.

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 data

privacy impact assessments ('DPA' or 'DPIA'). If processing involves sensitive personal data. Huawei also requires our suppliers to comply with requirements for personal data protection.

3. Safeguarding labour rights:

Huawei supports and protects the rights of its employees through detailed 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 for 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 the use of forced labour, whether overt or covert, as well as the use of child labour.

3. Safeguarding Labour Rights

- We support and protect the rights of our employees through detailed, equitable regulations that cover all stages of an employee's relationship with the company, including recruitment, employment and exit
- Committed to providing equal opportunities for all employees
- We do not discriminate against anyone when it comes to employee recruitment, promotion and compensation
- We prohibit the use of forced labor, whether overt or covert
- We prohibit all use of child labor

4. Maintaining a responsible supply chain:

Huawei works closely with our suppliers and partners. We align with our customers' sustainability requirements and any audit and due diligence requests.

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

In turn, we require that our suppliers 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. Huawei has a comprehensive qualification process for all new suppliers, and carries out annual audits on current suppliers, both at a corporate and at a local level. All suppliers are evaluated based on their sustainability performance, the results of audits, and the completion of any corrective actions. Their market share will be impacted if improvements are not made.

Respecting human rights has been a long-standing focus for Huawei. In compliance with all applicable laws, regulations, and standards, we actively communicate and collaborate with international organizations, governments, and industry institutions to develop human rights standards and guidelines in the use of new technologies, especially those technologies that are likely to be widely adopted. At the same time, we will continue to optimize management mechanisms to promptly identify, manage, and mitigate any related vulnerabilities or impact within our organization.

CONTROL ENVIRONMENT:

The control environment is the foundation of our internal control system. Huawei is committed to a corporate culture of integrity, business ethics, and compliance with laws, regulations and best practice guides.

The Huawei 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 organizations to ensure the effective separation of authority and responsibilities as well as checks and balances through mutual oversight.

Since 2020, Huawei has executed a global upgrade of its Regional Compliance Management Framework for compliance management based on Best Industry Benchmarking. Huawei has appointed compliance and supervisory board directors in every country and region where it operates. These directors manage and supervise the legal compliance of subsidiaries

through the following key measures along with CFOs at all levels of Huawei:

- Fully identifying and assessing risk under the ever-changing international business environment and taking measures to effectively manage and prevent compliance risks, especially those from new businesses and the digital domain;
- Formulating subsidiary compliance management policies and rules based on the company's unified compliance requirements and in accordance with local laws and regulations. This allows them to internalize external regulations and continually refine subsidiaries' basic rules and compliance incident management systems, thereby ensuring their ongoing compliance;
- Making compliance part of the key performance indicators (KPIs) of all business departments. Through ongoing efforts to strengthen our compliance management team and compliance management training, subsidiaries have built a strong culture of compliance.

In 2021, 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 obtaining 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 participating in the annual anti-corruption/anti-bribery benchmarking program with Transparency International since 2019 for the UK deployment areas of our business, and annually thereafter.

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

In addition, the CFO of Huawei is overall accountable for internal controls. The business control 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.

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/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.

Huawei's 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, and does not object to employees participating in lawfully registered trade unions voluntarily and without violating local laws.

Huawei has also established and maintained an effective employee communication mechanism. Employees can collect and understand employees' opinions and suggestions through various means, such as the Manager Feedback Plan (MFP), organizational 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 Huawei's 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. Huawei requires expatriates to study and pass exams and help them adapt to cross-cultural challenges and integrate into teams as soon as possible as part of the onboarding training for new overseas employees.

HUMAN RESOURCE RECRUITMENT:

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.

Exit management: Employees must submit exit applications at least 30 days in advance (three days in advance during the probation period). After the applications are approved and related services are completed, the employees will be paid all outstanding amounts.

Child labour: According to national laws and regulations as well as Huawei's policy requirements, we strictly prohibit the recruitment and use of child

labour (defined as aged under 18 within UK Modern Slavery Act 2015, s.56 (3)). Neither does Huawei employ juveniles (aged between 16 and 18). We have not found any infringements of these rules.

Communication and Feedback: The Huawei Manufacturing Department distributes the Guide to Managing Employee Relationships of the Manufacturing Department to all employees, which specifies communication channels for employees, to ensure employees' feelings and difficulties are understood in a timely manner, and helps ensure any employee problems are resolved.

Communication feedback channel cards are printed to help employees better understand the three-level communication feedback channels: department-level, manufacturing-level, and corporate-level. The communication forms include the democratic life meeting, open day, 1-to-1 communication, senior expert communication, performance communication, regular department meeting, and the new employee forum.



On the Huawei Songshan Lake campus

SUSTAINABLE SUPPLY CHAIN MANAGEMENT, MONITORING AND COMPLIANCE:

Huawei adheres to the Responsible Business Alliance (RBA) Code of Conduct which promotes compliance with various international standards whilst maintaining high standards of business ethics.

Huawei is committed to ensuring sustainable supply chain management practices and it continues to update its Supplier-Corporate Social Responsibility Agreement (CSRA), with elements focusing on labour practices, health and safety, the environment, business ethics, and management systems. All of

Huawei's suppliers are required to sign said agreements and it is a prerequisite to any supplier being on-boarded. Huawei participates in the joint audit cooperation (JAC) organised by our customers in order to make audits more accurate, thorough and efficient. Feedback from these audits are integrated into our procurement corporate social responsibility (CSR) processes. Additional detail is provided within the Huawei Annual Sustainability Report.

RISK ASSESSMENT MECHANISM

Huawei has a corporate group dedicated to internal controls and risk management to regularly assess risks to the company's global business processes. This department identifies, manages, and monitors significant risks, forecasts potential risks caused by changes to the internal and external environments, and submits risk management strategies along with risk mitigation measures for decision making.

All process owners are responsible for identifying, assessing, and managing business risks and taking necessary internal control measures. Huawei has instituted a mechanism for improving internal controls and risk controls to efficiently manage critical risks.

ON-BOARDING, AUDITING AND APPRAISING OUR SUPPLIERS:

In accordance with the Huawei Supplier Corporate Social Responsibility Agreement (Supplier CSRA), a screening, qualification and reviewing process is in place to identify any potential risks within the supply chain. Huawei's suppliers are subsequently required and expected to extend these requirements to their own vendors.

Supplier Risk Rating and Audit

Huawei adopts the risk-based supplier audit model. We conduct annual risk ratings for major suppliers that account for over 90% of the procurement spend.

This model classifies suppliers into three levels: high, medium, and low based on the comprehensive

assessment of procurement amount, material type, supplier location, CSR risk, and CSR performance of the previous year. In addition, high-risk and medium-risk suppliers are included in the annual sustainability audit plan.

In addition, Huawei conducts on-site sustainability system certification for all new suppliers to assess the capability and level of the suppliers to be introduced to comply with applicable laws and regulations and CSR agreements. Those who fail the certification cannot become Huawei suppliers.

Table 1: Supplier CSR on-site audits 2016-2021

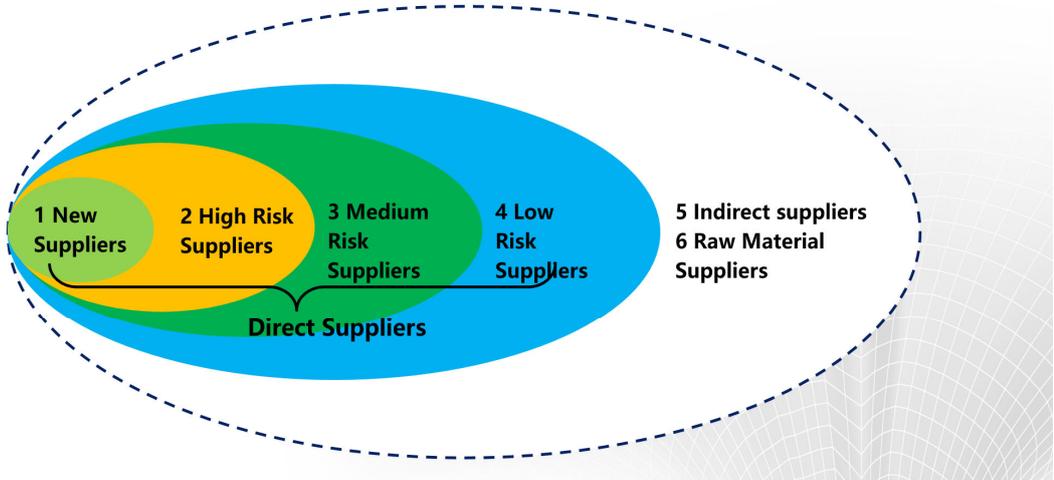


We have developed a supplier CSR audit checklist based on industry best practices and suppliers' CSR characteristics, which is regularly reviewed and updated. Huawei's CSR audit covers the prohibition of child labour, protection of underage workers, prohibition of modern slavery, prohibition of forced labour, anti-discrimination and punishment, freedom of association, working hours, wages and benefits, fire protection, safety and health, environmental protection, carbon emission reduction, business ethics, and CSR management of tier-2 suppliers.

CSR Redlines

We list the use of child labor and forced labor as a CSR redline in the entry threshold for suppliers. Huawei adopts a zero-tolerance policy for CSR redline violations and immediate remedial actions according to local laws and international guidance.

Risk Based Supplier Monitoring Approach



New Suppliers>High Risk Suppliers>Medium Risk Suppliers>Low Risk Suppliers>Indirect Suppliers>Raw Material Suppliers

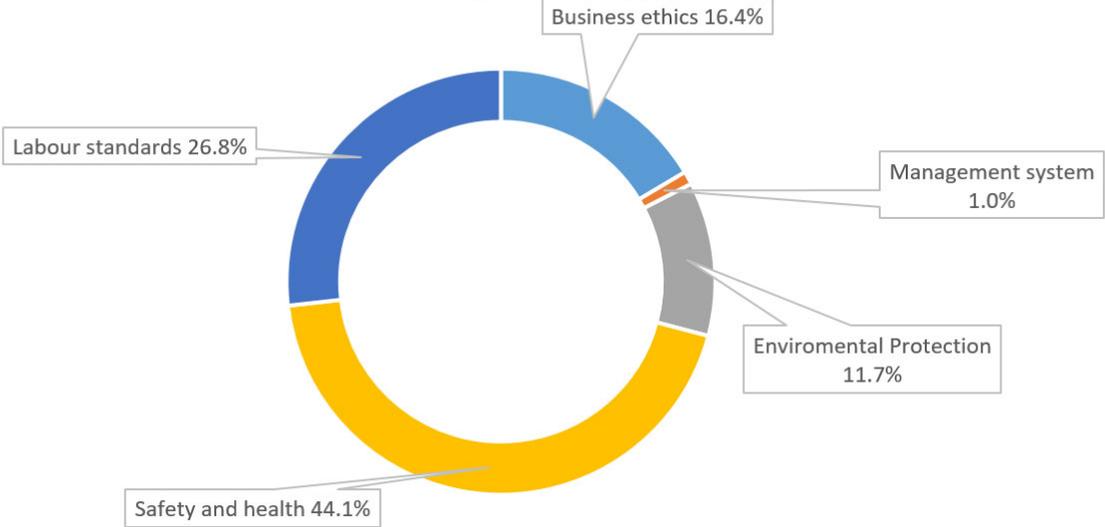
We conduct supplier audits using internationally recognized CSR audit methods, such as on-site inspections, employee interviews, management interviews, document reviews and web searches, and we conduct supplier environmental compliance audits using the Blue Map developed by the IPE Institute of Public & Environmental Affairs.

We coach suppliers to carry out CSR self-checks in advance, arrange experts to conduct on-site audits and verifications, identify issues, and provide improvement suggestions.

After an audit has taken place, suppliers are subject to performance appraisals.

Table 2: Supplier CSR Audit Findings: 2021

Issues discovered during 2021 Supplier CSR Audits



Note: In 2021, 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.

Suppliers are classified into one of four grades (A, B, C or D). This is based on the supplier's overall sustainability and CSR performance and represents each supplier's performance level in descending order. Rather than automatically terminating low performing suppliers, Huawei will help the supplier identify the root cause and develop solutions via targeted actions within a specified timeframe and by using our Check, Root Cause, Correct, Prevent, and Evaluate (CRCPE) methodology to identify common problems, analyze root causes (Man, Machine, Material, Method, and environMent - 5M) and Plan-Do-Check-Act [PDCA] management system). Ongoing assessments and improvements are made against established benchmarks. All such issues are recorded in Huawei's Supplier Corrective Action Request (SCAR) system for follow-up until closure.

Suppliers that are identified as either medium or high risk are also required to perform self-checks in order to identify and create corrective action and improvement plans. All issues are similarly logged and tracked to closure in the Huawei SCAR system.

Huawei maintains records of any identified non-conformities found and have publicly disclosed these figures in its annual sustainability report referenced above. Huawei aims to improve overall sustainability and CSR performance and, in order to implement this actively with suppliers, to improve rather than impose an immediate termination of contract – as is best practice across leading corporations in multiple business sectors.

The Huawei corrective action requirements are carefully monitored to help our suppliers improve their practices and results. In relation to suppliers with poor performance, Huawei reserves its rights to: report the activities of uncooperative suppliers to the relevant authorities; reduce the procurement quotas and requirements with such suppliers; and ultimately to terminate the supplier's business relationship.

To support the achievement of sustainable procurement objectives, we regularly carry out CSR training for all procurement employees. This includes procurement CSR agreements, procurement CSR

redline requirements, procurement CSR processes and CSR review skills, and we incorporate CSR requirements into the performance appraisal indicators of procurement departments at all levels and in all country operations.

Supplier Performance Management

Every year, Huawei appraises suppliers' overall performance based on their CSR performance, onsite audit results, and improvements implemented. When we appraise the CSR performance of our suppliers, we take into account how they manage their suppliers in turn. We encourage our suppliers to gradually establish a CSR management system based on the IPC-1401 Corporate Social Responsibility Management System Standard. Suppliers are classified into four grades (A, B, C, and D). These grades represent supplier performance in descending order of acceptability.

Industry Collaboration and Standardization

- Huawei participated in development of 5 industry standards and national standards to promote industry best practices through industry collaboration and standardization with industry associations of IPC, China association of communication enterprises(CACE) and China electronics standardization association (CESA), etc.
- As technical committee leader to facilitate consultation with 400 volunteer experts from 20 trade associations and 300 enterprises in 8 years to develop and modify IPC-1401 CSR management system standard 2017/2021, to integrate CSR as customer requirements into business process and functional operations.



The amount of business we do with each supplier depends partly on their CSR and sustainability performance, which is also a factor considered in our tendering, supplier selection, portfolio management, and other processes. Suppliers that perform well are given a larger quota of procurement and more business opportunities. The reverse is true for low-performing suppliers, especially those who have crossed the line we draw for CSR.

Depending on the situation, we instruct low-performing suppliers to resolve existing issues within a specified timeframe, reduce their quotas of procurement or business opportunities, and may even terminate business relationships with those that

display exceptionally poor performance with an inability to improve.

Supplier Responsibilities

Huawei regularly provides training and coaching for suppliers, and encourages them to adopt industry best practices and integrate CSR into their business strategies. This lowers their risk and enhances their operational efficiency. Each supplier has their own experience and competence that can benefit their peers.

We promote suppliers learning from each other through peer benchmarking and making joint progress. After years of exploration, we developed a low-cost and efficient peer benchmarking learning model. The basic process is as follows:

- 1) Topic collection: Collect CSR topics of common concern to suppliers and sort them by priority.
- 2) Benchmark analysis: Identify benchmark suppliers and conduct benchmark analysis to identify industry best practices.
- 3) Learning and sharing: Invite benchmark suppliers to share their best practices and learn industry standards and specifications.
- 4) Practice introduction: Organize experts to develop templates or checklists, guide suppliers to carry out self-checks, and introduce industry best practices.

Improving Suppliers' CSR Management Capabilities

Huawei attaches great importance to suppliers' CSR capability improvement and has taken a series of measures to help them more efficiently manage their CSR, reduce risks, and become more competitive. These measures include holding supplier conferences, organizing CSR management workshops, evaluating and coaching suppliers, rolling out targeted programs to improve suppliers' CSR capabilities, and implementing a strategic supplier development program.

Tier-2 supplier CSR management

Through CSR agreements, Huawei requires tier-1 suppliers to cascade CSR requirements to tier-2 suppliers level by level as part of tier-1 supplier CSR performance management. We link CSR performance to business performance, and have developed a reward and recognition and a continual improvement system.

Huawei arranges for professionals to evaluate and coach potential and new suppliers. This helps them understand and meet Huawei's CSR requirements as well as establish or improve their CSR management systems. Huawei regularly holds workshops on supplier CSR management, and provides guidance to suppliers on how to adopt industry best practices and incorporate CSR requirements into business strategies to reduce business risks and improve efficiency.

These improvements included identifying bottleneck processes, introducing production automation, and enhancing employee training. It also involved improving the stability of personnel in key positions, promoting information sharing among departments, enhancing communication with customers and suppliers, and optimizing production plans which together effectively reduced overtime while improving production efficiency.

More information as well as summaries of our findings can be found on our website and in our Annual Sustainability reports, published online.

SUPPLY CHAIN RESPONSIBILITIES:

Sustainability and CSR plays a vital role in our procurement strategy and is a key part of our supplier management process, from supplier qualification and selection to performance appraisals and day-to-day management. We work closely with customers and industry organizations to leverage suppliers to keep improving.

Huawei actively communicates and cooperates with stakeholders on broad sustainability topics, including holding CSR workshops with customers and suppliers, inviting customers to visit sites, jointly audit suppliers,

carrying out supplier capability improvement projects, participating in industry exchanges, and developing industry standards, to collectively improve the overall level and transparency of supply chain sustainability.

INDUSTRY PARTICIPATION, CO-OPERATION AND ENGAGEMENT:

Driving Suppliers to Improve Through JAC

Through 2021 Huawei continued to participate in the JAC (Joint Audit Cooperation) Academy pilot project and designated experts to attend its seminar.

Huawei's global procurement uses a complete CSR management system, including human rights, and has adopted industry CSR standards of the Responsible Business Alliance (RBA) and the Joint Audit Cooperation (JAC).

This includes a supplier CSR management system and both at corporate and at local level. Huawei does and will continue to require each of our suppliers to sign and comply fully with an associated CSR agreement in which forced labour is prohibited as a 'red line' management regulation. Should Huawei find any violation of the CSR agreement, particularly the non-compliance with the "red line" requirements, Huawei has a "zero tolerance" policy and takes swift and appropriate actions. This is a basic principle to which Huawei procurement has always adhered.

Huawei has implemented the requirements on the prohibition of forced labour in our supplier training, qualification and auditing of new suppliers, supplier CSR risk rating and re-auditing of high-risk suppliers, taking into account industry standards such as those of the RBA and JAC.

We also cooperated with JAC again in 2021 to conduct supplier CSR audits with our customers, including the requirement of prohibiting forced labour. Huawei also participated in JAC Academy and used JAC audit requirements to carry out supplier audits.

During 2010-2021 Huawei nominated 52 suppliers to participate in JAC joint audits in the telecoms sector and share audit reports with 17 JAC members. In

addition, 10 suppliers have received a JAC recognition award 2017-2021.

Additionally, as an RBA member, we actively cooperated with RBA in communication and supplier audits to improve CSR baselines.

Deepening Cooperation with Customers and Industry Organizations

Huawei regards CSR in the broadest sense as a key customer requirement, and embeds it into procurement strategies and processes to increase transparency across our supply chain.

As a consequence, we also work closely with customers on supplier management. For example, we invite customers to visit supplier facilities, conduct joint supplier audits with customers, and carry out employee surveys and supplier capacity building projects. This collaborative approach enhances CSR management across the supply chain.

To quote Huawei's Statement on Responsible Mineral Supply Chain Due Diligence Management: "as a member of the Global e-Sustainability Initiative (GeSI), Huawei is committed to global social responsibility and implements ethical procurement to promote sustainable development of the supply chain." A link to Huawei's Statement on Conflict-Affected/Responsible Minerals can also be found online.

As a key participant of the China Electronics Standardisation Association Huawei has an active role in setting the CSR standards for the electronics industry. Since 2009, Huawei has hosted numerous Global Supplier Sustainability Conferences and Regional Supplier Conferences.

Huawei proactively works with industry organizations to promote industry cooperation and standardization. We also work with upstream and downstream companies in the supply chain and convert industry best practices into industry standards to raise the CSR of the entire industry to a new level.

Since 2014 Huawei has worked with the Association Connecting Electronics Industries (IPC, founded as the

Institute of Printed Circuits) to develop the industry standard IPC-1401 Corporate Social Responsibility Management System Standard, the first revision focused on responsible procurement practices was published in 2017 and the second revision covering all functional operations is published in 2021.

In developing this standard Huawei acted as workgroup chair to collaborate with 400 expert volunteers from 20 industry associations and 300 electronics enterprises.

This standard adopted the ISO management system structure and was combined with OECD due diligence guidance. The IPC-1401 standard helps enterprises to develop its CSR strategy based on SWOT (strengths, weaknesses, opportunities and threats) analysis, to identify CSR risks and opportunities based on benchmarking with 5 level compliance obligations of laws and regulations, ethical standards, industry standards, customer requirements and its own strategic needs.

In turn, Huawei has introduced IPC-1401 standard to our suppliers, requiring them to similarly cascade to sub-tier suppliers.

Corporate social responsibility and corporate sustainable development are an intrinsic part of Huawei's procurement strategy. Our CSR management system in procurement was designed in accordance with international standards such as the UN Guiding Principles on Business and Human Rights, the OECD's Due Diligence Guidance for Responsible Business Conduct, as well as the IPC-1401 Corporate Social Responsibility Management System Standard. Our CSR agreements signed with suppliers are prepared according to internationally recognized industry standards such as the Responsible Business Alliance (RBA) Code of Conduct and the Joint Audit Cooperation (JAC) Supply Chain Sustainability Guidelines. We require all of our suppliers to sign the agreements and cascade our requirements to their suppliers. We incorporate CSR requirements into all parts of our supplier management process, from supplier admission, qualification and selection to performance appraisals and portfolio management,

and we work closely with customers and industry organizations to help suppliers continually improve.

In 2021, Huawei continued to optimize its CSR management system in procurement, shared due diligence management information with more than 70 customers, nominated three suppliers to participate in the JAC's joint audits, and shared our audit results with customers.

We assigned risk ratings to more than 1,600 major suppliers, who represented over 90% of our procurement spending, and conducted onsite audits on more than 300 new suppliers and existing suppliers that posed medium or high risks. The results of these audits were used in our supplier performance assessments and supplier selection decisions.

We also conducted more than 1,100 EHS audits on our subcontractors around the world. When we discovered problems during an audit, we helped the supplier use the CRCPE (check, root cause analysis, correct, prevent, evaluate) methodology to identify common problems and encouraged them to make improvements until the problems were resolved.

OPENNESS AND TRANSPARENCY:

In 2021, Huawei continued to make a concerted effort to enhance transparency and communicate more proactively with the world:

- The Huawei executive team has continued to engage with the global community through a number of external events and speaking opportunities,
- We have gone into great detail with the general public about our ownership and governance, subjecting our ownership structure, shareholding files, and registry of shareholding employees to public scrutiny,
- Huawei Investment & Holding Co., Ltd. is a private company wholly owned by its employees. Huawei's shareholders are the Union of Huawei Investment & Holding Co., Ltd. (the "Union") and Mr. Ren Zhengfei. Through the Union, the company implements an Employee Shareholding Scheme (the "Scheme"), which involved 131,507

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current employees or retired beneficiaries as of December 31, 2021.

MONITORING EFFECIVENESS:

In order to monitor the effectiveness of our strategy to prevent modern slavery, Huawei has established an internal compliance 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 AC and senior management. Huawei has also implemented a mechanism for internal control appraisals of GPOs and regional managers, holding them accountable and pursuing impeachment when and where necessary. The Audit Committee (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 Global Process Owners (GPOs) or business executives to explain their internal control issues and take 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.

In 2022 we aim to conduct internal training on human rights due diligence legislation in European countries, and to conduct internal training and supplier training based on OECD 'responsible business conduct due diligence' guidance.

ADDITIONAL STEPS 2021:

In line with Huawei's previous Modern Slavery statements, and in looking to the future, Huawei have taken the additional actions highlighted above to ensure full compliance and strengthen its 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 Huawei's organisation.

In 2021, we strengthened our governance and legal compliance approach through detailed compliance registers and alignment against ISO 37301 (Compliance Management).

In March 2021, Huawei 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 before aiming to trial this approach within other markets.

INCREASED AWARENESS: INTERNAL

Huawei's 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. This year Huawei repeated training to all staff globally to ensure awareness of the employee's right to whistle-blow 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 that Huawei remains fully legally compliant across all markets.

In March 2021, Huawei published its policy on Human Rights in its Annual Report, bringing together principles and practice across the whole business.

Huawei has recognised that there are further opportunities to include Modern Slavery as a periodic topic within the agenda of management meetings both locally and at the corporate level. Huawei is looking to take this a step further in developing an internal awareness programme for managers to ensure Modern Slavery is fully understood within the workplace and that all employees are aligned not only with Huawei's position on Modern Slavery but also with what they can do to assist in ensuring it never occurs within our operations.

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. Huawei's audit plan now 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, both at the global and at the regional and local level. 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.

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 2021 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 the following: Huawei Technologies (UK) Co., Ltd., Huawei Technologies Research & Development (UK) Limited., and Huawei Global Finance (UK) Limited.

Dated: 29th June 2022

Signed:



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